

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / General INF-NFL	John Tiley	142.5	Amend	<p>Considers that the Northern Reserves Management Plan 2008 (NRMP) reflects and guides how the Council values its landscape features including the approach to protection. [Inferred reason provided].</p> <p>The PDP facilitates development as a priority instead of protecting ridgelines, setting aside any adverse effects which harm community and amenity values.</p> <p>The NRMP adopts a philosophy that ridgelines, and associated open spaces, are significantly important to communities and the landscape must be protected accordingly. Continuing this approach would be consistent with precepts set out by Council over the last twenty years.</p> <p>Any protections provided are couched in terms of development effects being mitigated, minimised, remedied, minor, or carefully designed and managed. All these terms are subjective and fail to address the harm done by any intrusion on a ridgeline.</p> <p>As the city continues to grow, landscape values on a local and community scale assume greater importance to many without easy access to open space and the enjoyment of views of preserved areas such as the Town Belt and Outer Green Belt. Ridgelines across the city must enjoy protection to benefit their respective communities.</p> <p>[Refer to original submission for full reasons].</p>	Seeks that all city ridgelines remain free of any development.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / General INF-NFL	Churton Park Community Association	189.5	Amend	<p>Considers that the Northern Reserves Management Plan 2008 (NRMP) reflects and guides how the Council values its landscape features including the approach to protection. [Inferred reason provided].</p> <p>Considers that the PDP facilitates development as a priority instead of protecting ridgelines, setting aside any adverse effects which harm community and amenity values.</p> <p>The NRMP adopts a philosophy that ridgelines, and associated open spaces, are significantly important to communities and the landscape must be protected accordingly. Continuing this approach would be consistent with precepts set out by Council over the last twenty years.</p> <p>Any protections provided are couched in terms of development effects being mitigated, minimised, remedied, minor, or carefully designed and managed. All these terms are subjective and fail to address the harm done by any intrusion on a ridgeline.</p> <p>As the city continues to grow, landscape values on a local and community scale assume greater importance to many without easy access to open space and the enjoyment of views of preserved areas such as the Town Belt and Outer Green Belt. Ridgelines across the city must enjoy protection to benefit their respective communities.</p> <p>[Refer to original submission for full reasons].</p>	Seeks that all city ridgelines remain free of any development.

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Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / General INF-NFL	Meridian Energy Limited	228.29	Oppose in part	<p>Considers the Introduction to the INF-NFL chapter should include, 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.</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. Considers 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, considers 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.</p>	Retain the preamble to Chapter INF-NFL Infrastructure Natural Features and Landscapes with amendment.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / General INF-NFL	Meridian Energy Limited	228.30	Amend	<p>Considers the Introduction to the INF-NFL chapter should include, 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.</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. Considers 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, considers 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.</p>	<p>Amend the preamble to Chapter INF-NFL Infrastructure Natural Features and Landscapes, under the heading 'Other relevant District Plan provisions', by inserting 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>
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / General INF-NFL	Transpower New Zealand Limited	315.120	Amend	As a general comment, Transpower notes there are ten policies within the INF-NFL sub-chapter that are exclusive to the National Grid and the Gas Transmission Pipeline Corridor. Considers the number of policies is excessive and they could be rationalised.	Seeks to rationalise the number of policies in the Infrastructure - Natural Features and Landscapes (INF-NFL) chapter specific to the National Grid in the form of a revised set of National Grid specific policies.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / General INF-NFL	Transpower New Zealand Limited	315.121	Amend	Supports the introductory text to the INF-NFL chapter but seeks clarification that the National Grid is subject to specific policies and rules (P51 – P60 and R53, R54, R56 and R57) and the general sub-chapter provisions do not apply.	<p>Amend the introduction the Infrastructure - Natural Features and Landscapes chapter 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 Natural Features and Landscapes / General INF-NFL	Royal Forest and Bird Protection Society	345.78	Not specified	Considers that the provisions for this chapter should be no less protective than those in the Natural Features and Landscape chapter. The provisions (objectives, policies and rules) in this chapter should mirror the Natural Features and Landscape provisions, with the amendments made as sought by Forest & Bird in respect of that chapter.	Amend the chapter to mirror the Natural Features and Landscapes, and be as protective as that chapter.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / General INF-NFL	Royal Forest and Bird Protection Society	345.79	Oppose in part	Considers the Introduction does not acknowledge the potential adverse effects of infrastructure on indigenous biodiversity, landscape and natural character values. Seeks amendment to make it clear that these are important values that may be adversely affected, and which require protection. Considers other relevant District Plan provisions should similarly include reference to ECO, NFL, NATC and CE chapters.	Amend INF-NFL-Introduction to acknowledge the potential adverse effects of infrastructure on indigenous biodiversity, landscape and natural character values, and make it clear that these are important values that may be adversely affected and require protection.

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Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / General INF-NFL	Royal Forest and Bird Protection Society	345.80	Support in part	Seeks consequential amendments to give effect to submission points on INF-NFL policies above, and also to mirror the rules (as amended by F&B submissions) in the NFL chapters. Considers rules should be as protective as those sought by Forest & Bird in the NFL chapter.	Amend INF-NFL-R53-57 to give effect to policy changes requested in above submission points, mirror Natural Features and Landscapes rules, and be as protective as the amendments sought to the Natural Features and Landscapes chapter.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / General INF-NFL	Taranaki Whānui ki te Upoko o te Ika	389.58	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 Natural Features and Landscapes / New INF-NFL	Transpower New Zealand Limited	315.122	Amend	The policy approach is supported and considers it gives effect to Policies 2 and 5 of the NPS-ET. Considers that, notwithstanding the policy support, given the wider issues with how the policy framework within the INF-NFL chapter gives effect to the NPS-ET, Transpower seeks an amended policy framework specific to the National Grid that address all the natural environment overlays. Reference is also sought to include minor upgrade within the policy to reflect the permitted activity status for minor upgrade works within the NESETA and enabling policy framework within the NPS-ET.	Option 1: Seeks to add a new policy as follows: <u>NF-NFL-X Operation, maintenance, repair and minor upgrade of existing National Grid (NG) infrastructure within identified ridgelines and hilltops, special amenity landscapes, and outstanding natural features and outstanding landscapes (including within the coastal environment)</u> <u>Allow for the operation, maintenance, repair and minor upgrade of existing National Grid (NG)) infrastructure within identified ridgelines and hilltops, special amenity landscapes, and outstanding natural features and outstanding landscapes (including within the coastal environment), while managing the adverse effects of these activities.</u>
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / New INF-NFL	Transpower New Zealand Limited	315.123	Amend	The policy approach is supported and considers it gives effect to Policies 2 and 5 of the NPS-ET. Considers that, notwithstanding the policy support, given the wider issues with how the policy framework within the INF-NFL chapter gives effect to the NPS-ET, Transpower seeks an amended policy framework specific to the National Grid that address all the natural environment overlays. Reference is also sought to include minor upgrade within the policy to reflect the permitted activity status for minor upgrade works within the NESETA and enabling policy framework within the NPS-ET.	Option 2: Seeks to add a new National Grid specific policy as follows: <u>INF-NG-P2 Operation, and maintenance and minor upgrade of the National Grid</u> <u>Provide for the operation, maintenance and minor upgrade of the National Grid while managing the adverse effects of these activities</u>

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Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / New INF-NFL	Transpower New Zealand Limited	315.124	Amend	<p>Transpower has existing assets within identified areas of significant amenity landscapes. Considers the activity status for upgrades is regulated by the NESETA. Supports that component of the policy to “provide for the upgrading of existing National Grid infrastructure” on the basis it gives effect to the NPS-ET and in particular policy 2 and 5. However, submitter opposes the matters within the policy for the following reasons:</p> <ul style="list-style-type: none"> - Clause 1. Considers the term ‘at a scale’ is subjective and does not recognise the characterises and technical and operational requirements and constraints of the National Grid. The NPS-ET does not require the activity to be of a scale that protects the identified values. Considers the identified values in the scheduled areas are very broad and it is unclear what aspects of the values are to be maintained or restored. - Clause 3. Considers this is not applicable to the National Grid in that there are no assets within SAL’s with the coastal environment. <p>Transpower has concerns the policy does not give effect to the NPS-ET and therefore opposes INF-NFL-P57 and proposes an amended policy framework (to apply to SALs and ONFL’s) specific to the National Grid. The proposed approach has a ‘seek to avoid’ directive, considers this reflects policy 8 of the NPS-ET and provides a more appropriate and comprehensive policy framework that recognises the existing assets. Considers that utilisation and upgrading of existing National Grid assets should be facilitated in that it makes use of existing assets and will generally have less adverse environmental effect than that associated with the creation of new assets.</p>	<p>Add a new National Grid specific policy for Outstanding Natural Features and Landscapes and Significant Amenity Landscapes as follows:</p> <p><u>NF-NFL-XX Upgrade of existing National Grid (NG) infrastructure within special amenity landscapes, and outstanding natural features and outstanding landscapes (including within the coastal environment)</u></p> <p><u>In providing for the upgrade of existing National Grid (NG) infrastructure within special amenity landscapes, and outstanding natural features and outstanding landscapes (including within the coastal environment):</u></p> <ol style="list-style-type: none"> <u>1. Seek to avoid adverse effects on special amenity landscapes, and outstanding natural features and outstanding landscapes</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 Natural Features and Landscapes / New INF-NFL	Transpower New Zealand Limited	315.125	Amend	<p>Transpower has existing assets within identified areas of significant amenity landscapes. Considers the activity status for upgrades is regulated by the NESETA. Supports that component of the policy to “provide for the upgrading of existing National Grid infrastructure” on the basis it gives effect to the NPS-ET and in particular policy 2 and 5. However, submitter opposes the matters within the policy for the following reasons:</p> <ul style="list-style-type: none"> - Clause 1. Considers the term ‘at a scale’ is subjective and does not recognise the characterises and technical and operational requirements and constraints of the National Grid. The NPS-ET does not require the activity to be of a scale that protects the identified values. Considers the identified values in the scheduled areas are very broad and it is unclear what aspects of the values are to be maintained or restored. - Clause 3. Considers this is not applicable to the National Grid in that there are no assets within SAL’s with the coastal environment. <p>Transpower has concerns the policy does not give effect to the NPS-ET and therefore opposes INF-NFL-P57 and proposes an amended policy framework (to apply to SALs and ONFL’s) specific to the National Grid. The proposed approach has a ‘seek to avoid’ directive, considers this reflects policy 8 of the NPS-ET and provides a more appropriate and comprehensive policy framework that recognises the existing assets. Considers that utilisation and upgrading of existing National Grid assets should be facilitated in that it makes use of existing assets and will generally have less adverse environmental effect than that associated with the creation of new assets.</p>	<p>Add a new National Grid specific policy for Outstanding Natural Features and Landscapes and Significant Amenity Landscapes as follows:</p> <p><u>INF-NFL-XX Upgrade of existing National Grid (NG) infrastructure within special amenity landscapes, and outstanding natural features and outstanding landscapes (including within the coastal environment)</u></p> <p><u>In providing for the upgrade of existing National Grid (NG) infrastructure within special amenity landscapes, and outstanding natural features and outstanding landscapes (including within the coastal environment):</u></p> <ol style="list-style-type: none"> <u>1. Seek to avoid adverse effects on special amenity landscapes, and outstanding natural features and outstanding landscapes.</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.</u> <u>4. Recognise the potential benefits of upgrades to the National Grid to people and communities; and</u> <u>5. Remedy or mitigate any adverse effects from the operation, maintenance, upgrade, major upgrade or development of the National Grid which cannot be avoided.</u>

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Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / New INF-NFL	Royal Forest and Bird Protection Society	345.81	Amend	Seeks new policy to give effect to policy 11 of NZCPS.	Add new policy INF-NFL-PX (All infrastructure activities in ridgelines and hilltops, special amenity landscapes, outstanding natural features and landscapes): <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 Natural Features and Landscapes / INF-NFL-P38	Royal Forest and Bird Protection Society	345.82	Oppose	Opposes blanket provision for operation of infrastructure without consideration of related policy NFL-P2. Seek redrafting to ensure consideration of other relevant policies, or include wording in this policy to mirror NFL-P2.	Amend INF-NFL-P38 (Operation, maintenance and repair of existing infrastructure within ridgelines and hilltops): Allow for the operation, maintenance and repair of existing infrastructure within ridgelines and hilltops <u>with consideration given to NFL-P2.</u>
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P38	Waka Kotahi	370.125	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-NFL-P38 (Operation, maintenance and repair of existing infrastructure within ridgelines and hilltops) as notified.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P38	KiwiRail Holdings Limited	408.72	Support	Supports policy to allow for the operation, maintenance, repair and upgrade of existing infrastructure within identified ridgelines and hilltops. KRH-2 is located within the ridgelines and hilltops overlay.	Retain INF-NFL-P38 (Operation, maintenance and repair of existing infrastructure within ridgelines and hilltops) as notified.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P39	Chorus New Zealand Limited (Chorus), Spark New Zealand Trading Limited (Spark) and Vodafone New Zealand Limited (Vodafone)	99.52	Oppose in part	INF-NFL-P39 relates to Significant Amenity Landscapes and incorrectly refers to SCHED 12 and should refer to SCHED 11. It does correctly hyperlink to SCHED 11 in the ePlan.	Amend Policy INF-NFL-P39 (Operation, maintenance and repair of existing infrastructure within special amenity landscapes (including within the coastal environment)) to refer to SCHED 11 rather than SCHED 12.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P39	Powerco Limited	127.34	Oppose in part	Considers that the policy relates to Significant Amenity Landscapes and incorrectly refers to SCHED 12 and should refer to SCHED 11. It does correctly hyperlink to SCHED 11 in the ePlan.	Amend policy INF-NFL-P39 (Operation, maintenance and repair of existing infrastructure within special amenity landscapes (including the coastal environment)) to refer to SCHED11 (Special Amenity Landscapes) rather than SCHED12 (High Coastal Natural Character Areas) as follows: Allow for the operation, maintenance and repair of existing infrastructure located within special amenity landscapes where: 1. Associated earthworks and vegetation removal are of a scale that maintains or restores the identified values as described in <u>SCHED11, SCHED12.</u>
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P39	Royal Forest and Bird Protection Society	345.83	Oppose in part	Considers the policy needs to be no less protective than those in NFL chapter. Opposes use of "identified" as per previous submission comments and also seek that this cross references NFL and ECO provisions that provide for protection of biodiversity. Considers that amendments are needed include direction that effects are not only to be managed, but that certain areas, including overlays, need to be protected. This includes values in the coastal environment.	Amend INF-NFL-P39 (Operation, maintenance and repair of existing infrastructure within special amenity landscapes (including within the coastal environment)): Allow for the operation, maintenance and repair of existing infrastructure located within special amenity landscapes where: 1. Associated earthworks and vegetation removal are of a scale that maintains or restores the identified values as described in SCHED12. <u>2. [Insert reference to relevant NFL and ECO provisions for biodiversity protection]</u> <u>3. [Insert direction that effects are not only need to be managed but protected in certain areas]</u>

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Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P39	Waka Kotahi	370.126	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-NFL-P39 (Operation, maintenance and repair of existing infrastructure within special amenity landscapes (including within the coastal environment)) as notified.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P40	Chorus New Zealand Limited (Chorus), Spark New Zealand Trading Limited (Spark) and Vodafone New Zealand Limited (Vodafone)	99.53	Oppose in part	INF-NFL-P40 relates to Outstanding Natural Features and Outstanding Natural Landscapes and incorrectly refers to SCHED 11 and should refer to SCHED 10. It does correctly hyperlink to SCHED 10 in the ePlan.	Amend Policy INF-NFL-P40 (Operation, maintenance and repair of existing infrastructure within outstanding natural features and outstanding natural landscapes (including within the coastal environment)) to refer to SCHED 10 rather than SCHED 11.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P40	Royal Forest and Bird Protection Society	345.84	Oppose in part	Oppose blanket 'allow' direction for operation of existing infrastructure in ONFLs. We seek clearer direction to enable assessment of effects at the time of consenting. We oppose 'identified' values. This policy needs to give effect to policy 11 of the NZCPS. We also point out the drafting error in this policy as it should refer to SCHED10, rather than SCHED11.	Amend INF-NFL-P40 (Operation, maintenance and repair of existing infrastructure within outstanding natural features and outstanding natural landscapes (including within the coastal environment)): Allow for the operation, maintenance and repair of existing infrastructure located within outstanding natural features and outstanding natural landscapes where: 1. Associated earthworks and vegetation removal are of a scale that protects the identified values described in SCHED110. <u>[Add direction to enable assessment of effects at consenting stage, and amend overall policy to give effect to policy 11 of the NZ Coastal Policy Statement]</u>
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P40	Waka Kotahi	370.127	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-NFL-P40 (Operation, maintenance and repair of existing infrastructure within outstanding natural features and outstanding natural landscapes (including within the coastal environment)) as notified.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P41	Royal Forest and Bird Protection Society	345.85	Oppose in part	Seek amendment to say "Only allow" to ensure matters considered are provisional on meeting this policy.	Amend INF-NFL-P41 (Upgrading of existing infrastructure within ridgelines and hilltops): <u>Only a</u> Allow for the upgrading of existing infrastructure within ridgelines and hilltops where: 1. The activities is compliant with the underlying infrastructure provisions; and 2. Any adverse effects on the visual amenity and landscape values can be managed.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P41	Waka Kotahi	370.128	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-NFL-P41 (Upgrading of existing infrastructure within ridgelines and hilltops) as notified.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P41	KiwiRail Holdings Limited	408.73	Support	Supports policy to allow for the operation, maintenance, repair and upgrade of existing infrastructure within identified ridgelines and hilltops. KRH-2 is located within the ridgelines and hilltops overlay.	Retain INF-NFL-P41 (Upgrading of existing infrastructure within ridgelines and hilltops) as notified.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P42	Royal Forest and Bird Protection Society	345.86	Oppose in part	Considers a blanket "allow" policy is inappropriate as it gives no direction as to whether the effects of undergrounding may be appropriate.	Amend INF-NFL-P42 (Upgrading of existing infrastructure within a special amenity landscape (including within the coastal environment) that is located underground or within an existing legal road): Allow for the upgrading of existing infrastructure within a special amenity landscape area where the infrastructure is located underground or within an existing legal road <u>[add direction about what effects are considered appropriate when undergrounding]</u>
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P42	Waka Kotahi	370.129	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-NFL-P42 (Upgrading of existing infrastructure within a special amenity landscape (including within the coastal environment) that is located underground or within an existing legal road.) as notified.

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Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P43	Chorus New Zealand Limited (Chorus), Spark New Zealand Trading Limited (Spark) and Vodafone New Zealand Limited (Vodafone)	99.54	Oppose in part	INF-NFL-P43 relates to Significant Amenity Landscapes and incorrectly refers to SCHED 12 and should refer to SCHED 11. It does correctly hyperlink to SCHED 11 in the ePlan.	Amend Policy INF-NFL-P43 (Upgrading of existing infrastructure within a special amenity landscape (including within the coastal environment) that is located aboveground and outside an existing legal road) to refer to SCHED 11 rather than SCHED 12.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P43	Powerco Limited	127.35	Oppose in part	Considers that the policy relates to Significant Amenity Landscapes and incorrectly refers to SCHED 12 and should refer to SCHED 11. It does correctly hyperlink to SCHED 11 in the ePlan.	Amend policy INF-NFL-P43 (Upgrading of existing infrastructure within a special amenity landscaped (including within the coastal environment) that is located aboveground and outside an existing legal road) to refer to SCHED11 (Special Amenity Landscapes) rather than SCHED12 (High Coastal Natural Character Areas) as follows: Provide for the upgrading of existing infrastructure that is located above ground and outside an existing legal road within a special amenity landscape where: 1. The activity is of a scale that maintains or restores the identified values as described in <u>SCHED11</u> ; SCHED12 ; ...
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P43	Royal Forest and Bird Protection Society	345.87	Oppose in part	Considers it inappropriate to apply a 'provide for' direction to activities in the coastal environment, particularly for upgrading as it can cause significant adverse effects. Considers the matters for consideration don't provide for the protection of biodiversity and need to include relevant ECO and NFL provisions. Opposes 'identified' values and seeks deletion of point 4.	Amend INF-NFL-P43 (Upgrading of existing infrastructure within a special amenity landscape (including within the coastal environment) that is located aboveground and outside an existing legal road): Provide for the upgrading of existing infrastructure that is located above ground and outside an existing legal road within a special amenity landscape where: 1. The activity is of a scale that maintains or restores the identified values as described in SCHED12; 2. If located outside the coastal environment any adverse effects on the identified values can be avoided, remedied or mitigated; 3. If located within the coastal environment 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 4. There is a functional need or an operational need for the activity to be undertaken within the special amenity landscape. 4. It aligns with the matters set out in [the relevant ECO and NFL policies]
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P43	Waka Kotahi	370.130	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-NFL-P43 (Upgrading of existing infrastructure within a special amenity landscape (including within the coastal environment) that is located aboveground and outside an existing legal road) as notified.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P44	Royal Forest and Bird Protection Society	345.88	Oppose in part	Considers a blanket "allow" policy is inappropriate as it gives no direction as to whether the effects of undergrounding may be appropriate. Considers the policy needs to be conditional on considering other policies such as ECO-P1, NFL-P5 & P6 as well as the additional ECO and NFL policies sought by Forest & Bird to maintain biodiversity.	Amend INF-NFL-P44 (Upgrading of existing infrastructure within outstanding natural features and outstanding natural landscapes (including within the coastal environment) that is located underground or within an existing legal road): Provide for the upgrading of existing infrastructure within outstanding natural features and outstanding natural landscapes where the infrastructure is located underground or within an existing legal road <u>with consideration given to the appropriateness of effects as set out in ECO-P1, NFL-P5, NFL-P6 [and any other relevant ECO and NFL policies]</u>
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P44	Waka Kotahi	370.131	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-NFL-P44 (Upgrading of existing infrastructure within outstanding natural features and outstanding natural landscapes (including within the coastal environment) that is located underground or within an existing legal road) as notified.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P45	Chorus New Zealand Limited (Chorus), Spark New Zealand Trading Limited (Spark) and Vodafone New Zealand Limited (Vodafone)	99.55	Oppose	This policy applies to upgrading of infrastructure outside legal road and above ground within Outstanding Natural Features and Outstanding Natural Landscapes. Clause 1 of the policy has a requirement that the activity is of a scale that protects the identified values in SCHED10. This could have the effect of being treated as an “avoid” provision and appears to go beyond RPS Policy 26 which requires policies, rules or methods to protect outstanding natural features and outstanding natural landscapes from <u>inappropriate</u> subdivision, use or development. For functional and operational reasons some infrastructure such as telecommunications infrastructure may need to be located in these environments (e.g. for line of sight radio links). Therefore, it is important that the policy framework allows for this in appropriate circumstances, particularly where a facility may have significant community benefits, can not be reasonably located elsewhere and adverse effects are mitigated to the extent practicable.	Amend Policy INF-NFL-P45 (Upgrading of existing infrastructure within outstanding natural features and outstanding natural landscapes (including within the coastal environment) that is located above ground and outside an existing legal road) as follows: Only allow for the upgrading of existing infrastructure that is located outside an existing legal road and above ground within outstanding natural features and outstanding natural landscapes where: 1. <u>Having regard to the matters in Policy INF-P6</u> , the activity is of a scale that protects the identified values described in SCHED10 <u>from inappropriate development</u> ;
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P45	Royal Forest and Bird Protection Society	345.89	Oppose in part	Considers the policy fails to give effect to policies 11 and 15 of the NZCPS. Considers activities should be subject to consideration of NFL-P5 and P6, the INF-NFL-PXX policy sought below and all relevant ECO provisions. Opposes the use of “identified” values given the shortcomings of SCHED10, and seeks deletion of point 4.	Amend INF-NFL-P45 (Upgrading of existing infrastructure within outstanding natural features and outstanding natural landscapes (including within the coastal environment) that is located above ground and outside an existing legal road): Only allow for the upgrading of existing infrastructure that is located outside an existing legal road and above ground within outstanding natural features and outstanding natural landscapes where: 1. The activity is of a scale that protects the identified values described in SCHED10; 2. If located outside the coastal environment 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; 3. If located within the coastal environment any adverse effects on the identified values can be avoided; and 4. There is a functional need or operational need for the activity to be undertaken within the outstanding natural features and outstanding natural landscapes. 4. It aligns with the matters set out in NFL-P5, NFL-P6, INF-NFL-PX, and ECO-P1. [Amend overall policy to give effect to Policies 11 and 15 of NZ Coastal Policy Statement]
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P45	Waka Kotahi	370.132	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-NFL-P45 (Upgrading of existing infrastructure within outstanding natural features and outstanding natural landscapes (including within the coastal environment) that is located above ground and outside an existing legal road) as notified.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P46	Royal Forest and Bird Protection Society	345.90	Oppose in part	Opposes the ‘allow’ direction of this policy. Seek amendment to “Only allow...”	Amend INF-NFL-P46 (New infrastructure within identified ridgelines and hilltops): <u>Only a</u> Allow for the installation of new infrastructure within identified ridgelines and hilltops where: 1. The activities is compliant with the underlying zone provisions and general rules; and 2. Any adverse effects on the visual amenity and landscape values can be managed.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P46	Waka Kotahi	370.133	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-NFL-P46 (New infrastructure within identified ridgelines and hilltops) as notified.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P46	KiwiRail Holdings Limited	408.74	Support	Supports policy to allow for new infrastructure within identified ridgelines and hilltops.	Retain INF-NFL-P46 (New infrastructure within identified ridgelines and hilltops) as notified.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P47	Royal Forest and Bird Protection Society	345.91	Oppose in part	Considers it inappropriate to apply a 'provide for' direction to activities in the coastal environment, particularly for new infrastructure as it can cause significant adverse effects. While undergrounding is usually preferable, considers a blanket "provide for" policy is inappropriate as it does not give direction as to whether the effects are appropriate. Considers the matters for consideration don't provide for the protection of biodiversity and need to include relevant ECO and NFL provisions.	Amend INF-NFL-P47 (New infrastructure within a special amenity landscape (including within the coastal environment) that is located underground or within an existing legal road): Provide for the installation of new infrastructure within special amenity landscapes where the infrastructure is located underground or within an existing legal road <u>[with consideration given to the appropriateness of effects in reference to relevant ECO and NFL provisions]</u> .
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P47	Waka Kotahi	370.134	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-NFL-P47 (New infrastructure within a special amenity landscape (including within the coastal environment) that is located underground or within an existing legal road) as notified.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P48	Royal Forest and Bird Protection Society	345.92	Oppose in part	Considers the policy fails to give effect to policy 11 of the NZCPS. Activities should be subject to consideration of NFL-P3 & P4, ECO-P1 and the INF-NFL-PXX policy sought below. Opposes the use of 'identified' values and seeks deletion of point 4.	Amend INF-NFL-P48 (New infrastructure within a special amenity landscape (including within the coastal environment) that is located above ground and outside an existing legal road): Only allow for new infrastructure that is located outside an existing legal road and above ground within a special amenity landscape where: 1. The activity is of a scale that maintains or restores the identified values as described in SCHED11; 2. If located outside the coastal environment any adverse effects on the identified values can be avoided, remedied or mitigated; 3. If located within the coastal environment 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 4. There is a functional need or an operational need for the activity to be undertaken within the special amenity landscape <u>4. It aligns with the matters set out in NFL-P5, NFL-P6, INF-NFL-PX, and ECO-P1.</u> <u>[Amend overall policy to give effect to Policy 11 of NZ Coastal Policy Statement]</u>
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P48	Waka Kotahi	370.135	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-NFL-P48 (New infrastructure within a special amenity landscape (including within the coastal environment) that is located above ground and outside an existing legal road) as notified.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P49	Chorus New Zealand Limited (Chorus), Spark New Zealand Trading Limited (Spark) and Vodafone New Zealand Limited (Vodafone)	99.56	Oppose	This policy applies to new Infrastructure within Outstanding Natural Features and Outstanding Natural Landscapes outside of the Coastal Environment. Clause 1 of the policy has a requirement that the activity is of a scale that protects the identified values in SCHED10. This could have the effect of being treated as an "avoid" provision and appears to go beyond RPS Policy 26 which requires policies, rules or methods to protect outstanding natural features and outstanding natural landscapes from <u>inappropriate</u> subdivision, use or development. For functional and operational reasons some infrastructure such as telecommunications infrastructure may need to be located in these environments (e.g. for line of sight radio links). Therefore, it is important that the policy framework allows for this in appropriate circumstances, particularly where a facility may have significant community benefits, cannot be reasonably located elsewhere and adverse effects are mitigated to the extent practicable.	Amend Policy INF-NFL-P49 (New infrastructure within outstanding natural features and outstanding natural landscapes outside the coastal environment) as follows: Only allow new infrastructure within outstanding natural features and outstanding natural landscapes when located outside the coastal environment, where; 1. <u>Having regard to the matters in Policy INF-P6</u> , the activity is of a scale that protects the identified values described in SCHED10 <u>from inappropriate development</u> ;

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P49	Royal Forest and Bird Protection Society	345.93	Oppose in part	Considers activities should be subject to consideration of NFL-P5 and P6, the new INF-NFL-PXX policy (sought in below submission point) and ECO-P1. We oppose the use of "identified" and seek deletion of point 3	Amend INF-NFL-P49 (New infrastructure within outstanding natural features and outstanding natural landscapes outside the coastal environment): Only allow new infrastructure within outstanding natural features and outstanding natural landscapes when located outside the coastal environment, where: 1. The activity is of a scale that protects the identified values described in SCHED10; 2. Any significant adverse effects are avoided and any other adverse effects are avoided, remedied or mitigated; and 3. There is a functional need or operational need for the activity to be undertaken within an outstanding natural feature or outstanding natural landscape in the coastal environment. 3. It aligns with the matters set out in NFL-P5, NFL-P6, INF-NFL-PX, and ECO-P1.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P49	Waka Kotahi	370.136	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-NFL-P49 (New infrastructure within outstanding natural features and outstanding natural landscapes outside the coastal environment) as notified.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P50	Royal Forest and Bird Protection Society	345.94	Support in part	Opposes the use of "identified" values. Sports the avoidance of new infrastructure within ONFLs within the coastal environment.	Amend INF-NFL-P50 (New infrastructure within outstanding natural features and outstanding natural landscapes within the coastal environment): Avoid new infrastructure within outstanding natural features and outstanding natural landscapes within the coastal environment, unless it can shown that any adverse effects on the identified values can be avoided.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P50	Waka Kotahi	370.137	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-NFL-P50 (New infrastructure within outstanding natural features and outstanding natural landscapes within the coastal environment) as notified.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P51	Transpower New Zealand Limited	315.126	Support in part	The policy approach is supported and considers it gives effect to Policies 2 and 5 of the NPSET. Considers that, notwithstanding the policy support, given the wider issues with how the policy framework within the INF-NFL chapter gives effect to the NPSET, Transpower seeks an amended policy framework specific to the National Grid that address all the natural environment overlays. Reference is also sought to include minor upgrade within the policy to reflect the permitted activity status for minor upgrade works within the NESETA and enabling policy framework within the NPSET.	Supports the policy approach within the Infrastructure - Natural Features and Landscapes chapter, but seeks amendments.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P51	Transpower New Zealand Limited	315.127	Amend	The policy approach is supported and considers it gives effect to Policies 2 and 5 of the NPS-ET. Considers that, notwithstanding the policy support, given the wider issues with how the policy framework within the INF-NFL chapter gives effect to the NPS-ET, Transpower seeks an amended policy framework specific to the National Grid that address all the natural environment overlays. Reference is also sought to include minor upgrade within the policy to reflect the permitted activity status for minor upgrade works within the NESETA and enabling policy framework within the NPS-ET.	Delete reference to the National Grid from INF-NFL-P51 (Operation, maintenance and repair of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within identified ridgelines and hilltops).

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P52	Transpower New Zealand Limited	315.128	Amend	<p>The policy approach is supported and considers it gives effect to Policies 2 and 5 of the NPS-ET.</p> <p>Considers that, notwithstanding the policy support, given the wider issues with how the policy framework within the INF-NFL chapter gives effect to the NPS-ET, Transpower seeks an amended policy framework specific to the National Grid that address all the natural environment overlays. Reference is also sought to include minor upgrade within the policy to reflect the permitted activity status for minor upgrade works within the NESETA and enabling policy framework within the NPS-ET.</p>	Delete reference to the National Grid from INF-NFL-P52 (Operation, maintenance and repair of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within special amenity landscapes (including within the coastal environment)).
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P53	Transpower New Zealand Limited	315.129	Amend	<p>The policy approach is supported and considers it gives effect to Policies 2 and 5 of the NPS-ET.</p> <p>Considers that, notwithstanding the policy support, given the wider issues with how the policy framework within the INF-NFL chapter gives effect to the NPS-ET, Transpower seeks an amended policy framework specific to the National Grid that address all the natural environment overlays. Reference is also sought to include minor upgrade within the policy to reflect the permitted activity status for minor upgrade works within the NESETA and enabling policy framework within the NPS-ET.</p>	Delete reference to the National Grid from INF-NFL-P53 (Operation, maintenance and repair of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within outstanding natural features and outstanding landscapes (including within the coastal environment)).
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P54	Transpower New Zealand Limited	315.130	Amend	<p>Considers the existing National Grid assets traverse identified ridgelines and hilltops, and that the activity status for upgrades is regulated by the NESETA. Supports that component of the policy to “allow for the upgrading of existing National Grid infrastructure” on the basis it gives effect to the NPSET and in particular policy 2 which provides a very clear directive to ‘recognise and provide’ for the upgrade of the National Grid, and policy 5 to ‘enable’ the minor upgrade. However, opposes matters 1 and 2, within the policy for the following reasons:</p> <ul style="list-style-type: none"> - Clause 1. requires that “activities is compliant with the underlying infrastructure provisions”. Considers the policy directive is unclear in that it is not known what are the specific infrastructure provisions to which the directive relates and what is meant by the term ‘complaint with’. - Clause 2. considers that the directive has wide implication in that it requires any adverse effects be manged, regardless of scale. Ridgeline and Hilltop values are not defined or described in the PDP and therefore considers it is unclear what outcomes are sought but the policy. <p>Considers that ridgelines and hilltops are not a section 6 RMA matter, and are distinct from section 7 RMA significant amenity landscapes. Considers that given the national significance of the National Grid, the enabling policy framework within the NPSET, that ridgelines and hilltops have no higher order policy support, and that the policy relates to the upgrade of existing National Grid assets, seeks amendment to exclude the qualifiers from applying to the National Grid. Considers the policy does not give effect to the NPS-ET, and therefore opposes INF-NFL-P54 and instead proposes an amended policy framework specific to the National Grid. [Refer to original submission for full reason]</p>	<p>Amend policy INF-NFL-P54 (Upgrading of existing National Grid (NG) and Gas Transmission Pipeline Corridor (GTPC) infrastructure within identified ridgelines and hilltops as follows:</p> <p>INF-NFL-P54 Upgrading of existing National Grid (NG) and Gas Transmission Pipeline Corridor (GTPC) infrastructure within identified ridgelines and hilltops</p> <p>Allow for the upgrading of existing National Grid (NG) or Gas Transmission Pipeline Corridor (GTPC) infrastructure within identified ridgelines and hilltops, <u>and specific to the Gas Transmission Pipeline Corridor (GTPC), where:</u></p> <ol style="list-style-type: none"> 1. The activities is compliant with the underlying infrastructure provisions; and 2. Any adverse effects on the visual amenity and landscape values can be managed.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P55	Transpower New Zealand Limited	315.131	Oppose	<p>Considers Transpower has no existing assets in a significant amenity landscape that is located underground or within an existing legal road. As such considers the policy is not applicable to the National Grid and references to the Grid shall be deleted.</p>	Opposes reference to the National Grid in policy INF-NFL-P55 (Upgrading of existing National Grid (NG) or Gas Transmission Pipeline Corridor (GTPC) infrastructure within a special amenity landscape (including within the coastal environment) that is located underground or within an existing legal road).

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P55	Transpower New Zealand Limited	315.132	Amend	Considers Transpower has no existing assets in a significant amenity landscape that is located underground or within an existing legal road. As such the policy is not applicable to the National Grid and references to the Grid shall be deleted.	<p>Delete reference to the National Grid from policy INF-NFL-P55 (Upgrading of existing National Grid (NG) or Gas Transmission Pipeline Corridor (GTPC) infrastructure within a special amenity landscape (including within the coastal environment) that is located underground or within an existing legal road) as follows:</p> <p>INF-NFL-P55 Upgrading of existing National Grid (NG) or Gas Transmission Pipeline Corridor (GTPC) infrastructure within a special amenity landscape (including within the coastal environment) that is located underground or within an existing legal road</p> <p>Allow for the upgrading of existing National Grid (NG) or Gas Transmission Pipeline Corridor (GTPC) infrastructure within a special amenity landscape where the infrastructure is located underground or within an existing legal road.</p>
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P56	Transpower New Zealand Limited	315.133	Oppose	Considers the relationship between P55 and P56 is not clear (noting that P55 includes the proviso within the coastal environment and P56 relates to outside the coastal environment). Transpower has no existing assets in a significant amenity landscape that is located underground or within an existing legal road. As such considers the policy is not applicable to the National Grid and references to the Grid shall be deleted.	Opposes reference to the National Grid in (Upgrading of existing National Grid (NG) and Gas Transmission Pipeline Corridor (GTPC) infrastructure within special amenity landscapes (outside of the coastal environment) that is located underground or within an existing legal road) policy INF-NFL-P56.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P56	Transpower New Zealand Limited	315.134	Amend	Considers the relationship between P55 and P56 is not clear (noting that P55 includes the proviso within the coastal environment and P56 relates to outside the coastal environment). Transpower has no existing assets in a significant amenity landscape that is located underground or within an existing legal road. As such considers the policy is not applicable to the National Grid and references to the Grid shall be deleted.	<p>Delete reference to the National Grid from policy INF-NFL-P56 (Upgrading of existing National Grid (NG) and Gas Transmission Pipeline Corridor (GTPC) infrastructure within special amenity landscapes (outside of the coastal environment) that is located underground or within an existing legal road) as follows:</p> <p>INF-NFL-P56 Upgrading of existing National Grid (NG) and Gas Transmission Pipeline Corridor (GTPC) infrastructure within special amenity landscapes (outside of the coastal environment) that is located underground or within an existing legal road</p> <p>Provide for the upgrading of existing infrastructure (outside CE) where the infrastructure is located underground or within an existing legal road.</p>
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P57	Transpower New Zealand Limited	315.135	Oppose	<p>Transpower has existing assets within identified areas of significant amenity landscapes. Considers the activity status for upgrades is regulated by the NESETA. Supports that component of the policy to “provide for the upgrading of existing National Grid infrastructure” on the basis it gives effect to the NPS-ET and in particular policy 2 and 5. However, submitter opposes the matters within the policy for the following reasons:</p> <ul style="list-style-type: none"> - Clause 1. Considers the term ‘at a scale’ is subjective and does not recognise the characterises and technical and operational requirements and constraints of the National Grid. The NPS-ET does not require the activity to be of a scale that protects the identified values. Considers the identified values in the scheduled areas are very broad and it is unclear what aspects of the values are to be maintained or restored. - Clause 3. Considers this is not applicable to the National Grid in that there are no assets within SAL’s with the coastal environment. <p>Transpower has concerns the policy does not give effect to the NPS-ET and therefore opposes INF-NFL-P57 and proposes an amended policy framework (to apply to SALs and ONFL’s) specific to the National Grid. The proposed approach has a ‘seek to avoid’ directive, considers this reflects policy 8 of the NPS-ET and provides a more appropriate and comprehensive policy framework that recognises the existing assets. Considers that utilisation and upgrading of existing National Grid assets should be facilitated in that it makes use of existing assets and will generally have less adverse environmental effect than that associated with the creation of new assets.</p>	<p>Opposes reference to the National Grid in policy INF-NFL-P57 (Upgrading of existing National Grid (NG) or Gas Transmission Pipeline Corridor (GTPC) infrastructure within a special amenity landscape (including within the coastal environment) that is located aboveground and outside an existing legal road).</p> <p>[And add new policy specific to the National Grid for Outstanding Natural Features and Landscapes and Significant Amenity Landscapes]</p>

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P57	Transpower New Zealand Limited	315.136	Amend	<p>Transpower has existing assets within identified areas of significant amenity landscapes. Considers the activity status for upgrades is regulated by the NESETA. Supports that component of the policy to “provide for the upgrading of existing National Grid infrastructure” on the basis it gives effect to the NPSET and in particular policy 2 and 5. However, submitter opposes the matters within the policy for the following reasons:</p> <ul style="list-style-type: none"> - Clause 1. Considers the term ‘at a scale’ is subjective and does not recognise the characterises and technical and operational requirements and constraints of the National Grid. The NPSET does not require the activity to be of a scale that protects the identified values. Considers the identified values in the scheduled areas are very broad and it is unclear what aspects of the values are to be maintained or restored. - Clause 3. Considers this is not applicable to the National Grid in that there are no assets within SAL’s with the coastal environment. <p>Transpower has concerns the policy does not give effect to the NPSET and therefore opposes INF-NFL-P57 and proposes an amended policy framework (to apply to SALs and ONFL’s) specific to the National Grid. The proposed approach has a ‘seek to avoid’ directive, considers this reflects policy 8 of the NPSET and provides a more appropriate and comprehensive policy framework that recognises the existing assets. Considers that utilisation and upgrading of existing National Grid assets should be facilitated in that it makes use of existing assets and will generally have less adverse environmental effect than that associated with the creation of new assets.</p>	<p>Delete reference to the National Grid from policy INF-NFL-P57 (Upgrading of existing National Grid (NG) or Gas Transmission Pipeline Corridor (GTPC) infrastructure within a special amenity landscape (including within the coastal environment) that is located aboveground and outside an existing legal road).</p> <p>[And add new policy specific to the National Grid for Outstanding Natural Features and Landscapes and Significant Amenity Landscapes]</p>
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P58	Transpower New Zealand Limited	315.137	Oppose	<p>Transpower has existing assets within identified areas of significant amenity landscapes. Considers the activity status for upgrades is regulated by the NESETA. Supports that component of the policy to “provide for the upgrading of existing National Grid infrastructure” on the basis it gives effect to the NPS-ET and in particular policy 2 and 5. However, submitter opposes the matters within the policy for the following reasons:</p> <ul style="list-style-type: none"> - Clause 1. Considers the term ‘at a scale’ is subjective and does not recognise the characterises and technical and operational requirements and constraints of the National Grid. The NPS-ET does not require the activity to be of a scale that protects the identified values. Considers the identified values in the scheduled areas are very broad and it is unclear what aspects of the values are to be maintained or restored. - Clause 3. Considers this is not applicable to the National Grid in that there are no assets within SAL’s with the coastal environment. <p>Transpower has concerns the policy does not give effect to the NPS-ET and therefore opposes INF-NFL-P57 and proposes an amended policy framework (to apply to SALs and ONFL’s) specific to the National Grid. The proposed approach has a ‘seek to avoid’ directive, considers this reflects policy 8 of the NPS-ET and provides a more appropriate and comprehensive policy framework that recognises the existing assets. Considers that utilisation and upgrading of existing National Grid assets should be facilitated in that it makes use of existing assets and will generally have less adverse environmental effect than that associated with the creation of new assets.</p>	<p>Opposes reference to the National Grid in policy INF-NFL-P58 (Upgrading of existing National Grid (NG) and Gas Transmission Pipeline Corridor (GTPC) infrastructure within outstanding natural features and outstanding landscapes (including within the coastal environment).</p> <p>[And add new policy specific to the National Grid for Outstanding Natural Features and Landscapes and Significant Amenity Landscapes]</p>

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P58	Transpower New Zealand Limited	315.138	Amend	<p>Transpower has existing assets within identified areas of significant amenity landscapes. Considers the activity status for upgrades is regulated by the NESETA. Supports that component of the policy to “provide for the upgrading of existing National Grid infrastructure” on the basis it gives effect to the NPSET and in particular policy 2 and 5. However, submitter opposes the matters within the policy for the following reasons:</p> <ul style="list-style-type: none"> - Clause 1. Considers the term ‘at a scale’ is subjective and does not recognise the characterises and technical and operational requirements and constraints of the National Grid. The NPSET does not require the activity to be of a scale that protects the identified values. Considers the identified values in the scheduled areas are very broad and it is unclear what aspects of the values are to be maintained or restored. - Clause 3. Considers this is not applicable to the National Grid in that there are no assets within SAL’s with the coastal environment. <p>Transpower has concerns the policy does not give effect to the NPSET and therefore opposes INF-NFL-P57 and proposes an amended policy framework (to apply to SALs and ONFL’s) specific to the National Grid. The proposed approach has a ‘seek to avoid’ directive, considers this reflects policy 8 of the NPSET and provides a more appropriate and comprehensive policy framework that recognises the existing assets. Considers that utilisation and upgrading of existing National Grid assets should be facilitated in that it makes use of existing assets and will generally have less adverse environmental effect than that associated with the creation of new assets.</p>	<p>Delete reference to the National Grid from policy INF-NFL-P58 (Upgrading of existing National Grid (NG) and Gas Transmission Pipeline Corridor (GTPC) infrastructure within outstanding natural features and outstanding landscapes (including within the coastal environment).</p> <p>[And add new policy specific to the National Grid for Outstanding Natural Features and Landscapes and Significant Amenity Landscapes]</p>
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P59	Transpower New Zealand Limited	315.139	Oppose	<p>Considers that it is not clear why INF-NFL-P59 is within the NFL chapter given it relates to the CE and not NFL’s. As with other INF-NFL policies, Transpower opposes INF-NFL-P59. Considers policy INF-NFL-P59 has implications for any new Cook Strait cables at Oteranga Bay, and other new National Grid assets within the CE. Considers the avoid directive within the policy does not give effect to the NPS-ET, including Policy 8, noting that it applies to the entire coastal environment and not only the higher values areas. Considers the higher order policy support for the policy is not clear noting the NZCPS does not impose a blanket avoid requirement for the coastal environment, within Policy 6(1)(a) recognising the provision of infrastructure and the transmission of electricity. Seeks a new policy that provides a comprehensive policy approach that gives effect to and reconciles the NPS-ET and NZCPS. Considers given the comprehensive nature of the policy sought, it is proposed to be located in the INF chapter rather than sub chapters.</p>	<p>Delete policy INF-NFL-P59 (New National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within the coastal environment) in its entirety.</p> <p>[And add new policy specific to the National Grid in the Infrastructure (INF) chapter]</p>

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-P60	Transpower New Zealand Limited	315.140	Oppose	<p>Opposes INF-NFL-P60 and proposes an amended policy framework specific to the National Grid. Has specific concerns the policy does not give effect to the NPSET in that:</p> <ul style="list-style-type: none"> - Specific to clause 1. 2. and 3., considers the NPS-ET does not require the activity to be of a scale that protects the identified values for ONFL's, not maintains or restores those for SAL's. It does not require the avoidance of visually obtrusive structures within ridgelines and hilltops. The ridgelines and hilltops cover a large extent of the city and given the linear nature of the transmission network and the visual element associated with its support structures, considers it would not be possible or practicable to 'avoid visually obtrusive structures. - In response to clause 4. considers the NPS-ET does not require significant adverse effects be avoided. - Considers Clause 5. is acceptable in so far as it relates to functional or operational need. Considers the reference to 'reasonably practical alternative locations' is not necessary given the definitions of operational and functional need. Has concerns with the term 'practical' as it is considered to introduce uncertainty. Considers the term 'practicable' is more readily understood. <p>[Refer to original submission for full reason</p>	<p>Delete INF-NFL-P60 (New National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within outstanding natural features and outstanding landscapes, special amenity landscapes or identified landscapes or identified ridgelines and hilltops, outside the coastal environment).</p> <p>[And add a new National Grid specific policy in the Infrastructure chapter]</p>
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-R48	Firstgas Limited	304.34	Support	INF-NFL-R48 is supported as it provides for the operation, maintenance, repair and upgrading of infrastructure within the special amenity landscapes or identified ridgelines and hilltops.	Retain INF-NFL-R48 (Operation, maintenance and repair of existing infrastructure within outstanding natural features and outstanding landscapes, special amenity landscapes or identified ridgelines and hilltops (including within the coastal environment)) as notified.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-R48	Waka Kotahi	370.138	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-NFL-R48 (Operation, maintenance and repair of existing infrastructure within outstanding natural features and outstanding landscapes, special amenity landscapes or identified ridgelines and hilltops (including within the coastal environment)) as notified.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-R48	KiwiRail Holdings Limited	408.75	Support	Supports this rule which allows for the operation, maintenance and repair of existing infrastructure within identified ridgelines and hilltops, subject to earthworks standards.	Retain INF-NFL-R48 (Operation, maintenance and repair of existing infrastructure within outstanding natural features and outstanding landscapes, special amenity landscapes or identified ridgelines and hilltops (including within the coastal environment)) as notified.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-R49	Firstgas Limited	304.35	Support	INF-NFL-R49 is supported as it provides for the operation, maintenance, repair and upgrading of infrastructure within the special amenity landscapes or identified ridgelines and hilltops.	Retain INF-NFL-R49 (Upgrading of existing infrastructure within the special amenity landscapes or identified ridgelines and hilltops) as notified.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-R49	Waka Kotahi	370.139	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-NFL-R49 (Upgrading of existing infrastructure within the special amenity landscapes or identified ridgelines and hilltops) as notified.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-R49	KiwiRail Holdings Limited	408.76	Amend	Supports provision for upgrading infrastructure within identified ridgelines and hilltops. However, KiwiRail seek amendment to allow for upgrades to the radio station at Hawkins Hill.	<p>Amend INF-NFL-R49 (Upgrading of existing infrastructure within the special amenity landscapes or identified ridgelines and hilltops) as follows:</p> <p>☐</p> <p>Activity status: Permitted</p> <p>Where:</p> <ul style="list-style-type: none"> a. the infrastructure is located underground; or b. the infrastructure is located within an existing <u> rail or road </u> reserve; or c. the upgrade is contained entirely within an existing building or structure.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-R50	Waka Kotahi	370.140	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-NFL-R50 (Upgrading of existing infrastructure within outstanding natural features and outstanding landscapes) as notified.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-R51	Waka Kotahi	370.141	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-NFL-R51 (New infrastructure within outstanding natural features and outstanding landscapes) as notified.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-R52	Waka Kotahi	370.142	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-NFL-R52 (New infrastructure within special amenity landscapes or identified ridgelines and hilltops) as notified.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-R52	Taranaki Whānui ki te Upoko o te Ika	389.59	Amend	Considers that in relation to Natural Features and Landscapes chapter that there are no triggers for active engagement with Mana Whenua.	Seeks amendment to INF-NFL-R52.2 (New infrastructure within special amenity landscapes or identified ridgelines and hilltops) to include triggers for active engagement with Taranaki Whānui in relation to SASM as matter of discretion under rule.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-R52	KiwiRail Holdings Limited	408.77	Amend	Supports provision for new infrastructure within identified ridgelines and hilltops. However, KiwiRail seek amendment to allow for new infrastructure.	Amend INF-NFL-R52 (New infrastructure within special amenity landscapes or identified ridgelines and hilltops) as follows: Activity status: Permitted Where: a. The infrastructure is located underground; or b. The infrastructure is located within an existing rail or road reserve.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-R53	Transpower New Zealand Limited	315.141	Oppose	Considers existing National Grid assets traverse Outstanding Natural Landscapes (at Oteranga Bay noting that while some of the assets are within the Oteranga Bay designation, others are not), Special Amenity Landscapes across the city, and Ridgelines and Hilltops across the city. The existing assets within the Boom Rock/Pipinui Point Escarpment Outstanding Natural Features overlay are within the Transpower Te Hikowhenua Shore Electrode Station Designation (ID: TPR5) and are therefore no subject to any rule. Considers the NESETA provides prevailing provisions for maintenance, reconductoring, increasing voltage, structure addition or replacement, and removal, for the National Grid. Considers that INF-NFL-R53 for existing National Grid structures captured by the NESETA is of no relevance to Transpower in respect of rule application and only adds confusion and potential errors in the application of rules.	Opposes reference to the National Grid in INF-NFL-R53 (Operation, maintenance and repair of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within outstanding natural features and outstanding landscapes, special amenity landscapes or identified ridgelines and hilltops (including within the coastal environment).
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-R53	Transpower New Zealand Limited	315.142	Amend	Considers existing National Grid assets traverse Outstanding Natural Landscapes (at Oteranga Bay noting that while some of the assets are within the Oteranga Bay designation, others are not), Special Amenity Landscapes across the city, and Ridgelines and Hilltops across the city. The existing assets within the Boom Rock/Pipinui Point Escarpment Outstanding Natural Features overlay are within the Transpower Te Hikowhenua Shore Electrode Station Designation (ID: TPR5) and are therefore no subject to any rule. Considers the NESETA provides prevailing provisions for maintenance, reconductoring, increasing voltage, structure addition or replacement, and removal, for the National Grid. Considers that INF-NFL-R53 for existing National Grid structures captured by the NESETA is of no relevance to Transpower in respect of rule application and only adds confusion and potential errors in the application of rules.	Delete reference to the National Grid from Rule INF-NFL-R53 (Operation, maintenance and repair of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within outstanding natural features and outstanding landscapes, special amenity landscapes or identified ridgelines and hilltops (including within the coastal environment) as follows: INF-NFL-R53 Operation, maintenance and repair of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within outstanding natural features and outstanding landscapes, special amenity landscapes or identified ridgelines and hilltops (including within the coastal environment) All Zones 1. Activity status: Permitted

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-R54	Transpower New Zealand Limited	315.143	Oppose	Considers that existing National Grid assets traverse Outstanding Natural Landscapes (at Oteranga Bay noting that while some of the assets are within the Oteranga Bay designation, others are not), Special Amenity Landscapes across the city, and Ridgelines and Hilltops across the city. Considers the existing assets within the Boom Rock/Pipinui Point Escarpment Outstanding Natural Features overlay are within the Transpower Te Hikowhenua Shore Electrode Station Designation (ID: TPR5) and are therefore no subject to any rule. Considers the NESETA provides prevailing provisions for the upgrading of the National Grid. 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. Considers INF-NFL-R54 for existing National Grid structures captured by the NESETA is of no relevance to Transpower in respect of rule application and adds confusion and potential errors in the application of rules.	Delete rule INF-NFL-54 (Upgrading of existing National Grid (NG) infrastructure within outstanding natural features and outstanding landscapes, special amenity landscapes, or identified ridgelines and hilltops) in its entirety.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-R56	Transpower New Zealand Limited	315.144	Support in part	Considers that the NESETA does not apply to new National Grid assets. On this basis, Transpower supports the default discretionary activity rule as it provides a robust consenting framework whilst still recognising the national significance of the National Grid. Notwithstanding its support for a discretionary activity status, Transpower does query whether a discretionary activity status is appropriate for Ridgelines and Hilltops and seeks a restricted discretionary activity status for Ridgelines and Hilltops. Transpower is concerned Ridgelines and Hilltops are afforded the same policy framework as ONFL's even they are not section 6 RMA matters. The rationalise and even need for the Ridgelines and Hilltops is not evident given the identification of ONFLs and SALs.	Retain INF-NFL-R56 (New National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within outstanding natural features and outstanding landscapes, special amenity landscapes or identified ridgelines and hilltops), with amendment.
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-R56	Transpower New Zealand Limited	315.145	Amend	Considers that the NESETA does not apply to new National Grid assets. On this basis, Transpower supports the default discretionary activity rule as it provides a robust consenting framework whilst still recognising the national significance of the National Grid. Notwithstanding its support for a discretionary activity status, Transpower does query whether a discretionary activity status is appropriate for Ridgelines and Hilltops and seeks a restricted discretionary activity status for Ridgelines and Hilltops. Transpower is concerned Ridgelines and Hilltops are afforded the same policy framework as ONFL's even they are not section 6 RMA matters. The rationalise and even need for the Ridgelines and Hilltops is not evident given the identification of ONFLs and SALs.	Amend the activity status under INF-NFL-R56 (New National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within outstanding natural features and outstanding landscapes, special amenity landscapes or identified ridgelines and hilltops) insofar as it relates to ridgelines and hilltops to Restricted Discretionary as follows: INF-NFL-R56.1 New National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within outstanding natural features and outstanding landscapes, <u>and</u> special amenity landscapes or identified ridgelines and hilltops . 1. Activity Status: Discretionary INF-NFL-R56.2 New National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within identified ridgelines and hilltops 2. Activity Status: Restricted Discretionary
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-R57	Transpower New Zealand Limited	315.146	Oppose	Considers the entire southern and western coastline is identified as an ONFL [see original submission for supplied image]. Opposes the non-complying activity status on the basis it does not give effect to the NPS-ET. The rule and associated policy framework would mean essential and nationally significant (as recognised in the NPS-ET) new National Grid assets (such as a new Cook Strait Cable within the existing Cook Strait Cable Protection Zone) would potentially not be able to secure consent in that it would be subject to a non-complying activity status and an 'avoid' policy directive (under P59) and therefore unable to pass the s104 RMA 'gateway test'. The activity status does not give effect to the NPS-ET.	Opposes the non-complying activity status for the new National Grid infrastructure within Rule INF-NFL-R57 (New National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within outstanding natural features and outstanding landscapes, special amenity landscapes or identified ridgelines and hilltops).

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-R57	Transpower New Zealand Limited	315.147	Amend	<p>Considers the entire southern and western coastline is identified as an ONFL [see original submission for supplied image].</p> <p>Opposes the non-complying activity status on the basis it does not give effect to the NPS-ET. The rule and associated policy framework would mean essential and nationally significant (as recognised in the NPS-ET) new National Grid assets (such as a new Cook Strait Cable within the existing Cook Strait Cable Protection Zone) would potentially not be able to secure consent in that it would be subject to a non-complying activity status and an 'avoid' policy directive (under P59) and therefore unable to pass the s104 RMA 'gateway test'. The activity status does not give effect to the NPS-ET.</p>	<p>Amend the activity status for the new National Grid infrastructure within Rule INF-NFL-R57 (New National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within outstanding natural features and outstanding landscapes, special amenity landscapes or identified ridgelines and hilltops) from non-complying to discretionary activity status, as follows:</p> <p>INF-NFL-R57 New National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within outstanding natural features and outstanding landscapes, within the coastal environment</p> <p>All Zones 1. Activity status: Non-Complying</p> <p><u>INF-NFL-R57a New National Grid (NG) infrastructure within outstanding natural features and outstanding landscapes, within the coastal environment</u></p> <p>All Zones 1. Activity status: Discretionary</p>
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-S21	Firstgas Limited	304.36	Amend	<p>Considers that INF-NFL-S21 should be amended. The ability to excavate up to a maximum volume of 350m3 per project during maintenance and repair works on existing infrastructure is required. This volume is based on the depth of the pipeline and standard operating procedures for trenching.</p>	<p>Amend INF-NFL-S21 (Earthworks) as follows:</p> <p>1. Earthworks must not exceed:</p> <p>a. More than 50m3 per transmission line support structure; or</p> <p>b. 100m3 per access track-;</p> <p>c. <u>More than 350m3 per maintenance or repair project.</u></p>
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-S21	Transpower New Zealand Limited	315.148	Not specified	<p>Considers standard INF-NFL-S21 is applied to Rule INF-NFL-R48 which is not applicable to the National Grid. On that basis submitter is neutral on INF-NFL-S21. Considers that if the intent is for INF-NFL-S21 to apply to the National Grid (under Rules R53, 56 and 57) Transpower opposes its application as it either duplicates the NESETA or has not basis for inclusion as a standard for new National Grid assets. [Submitter has stated position as Neutral]</p>	<p>Retain INF-NFL-S21 (Earthworks) as notified, on the basis that it is not applicable to the National Grid.</p> <p>[Submitter has stated position as neutral]</p>
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-S21	Greater Wellington Regional Council	351.98	Amend	<p>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.</p>	<p>Seeks to amend wording to remove 'identified' before 'significant biodiversity values' when referring to adverse effects caused by activities or maintenance of biodiversity values.</p>
Energy Infrastructure and Transport / Infrastructure Natural Features and Landscapes / INF-NFL-S21	Waka Kotahi	370.143	Support	<p>These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.</p>	<p>Retain INF-NFL-S21 (Earthworks) as notified.</p>