

# Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region – Further Submission Form (Form 6)

Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. The closing date for Further Submissions is 5:00pm Friday 8 March 2024.

## Who can make a Further Submission?

A Further Submission may be made by any person who:

- Represents a relevant aspect of the public interest; or
- Has an interest in the proposal that is greater than the interest of the general public. (an explanation for the reasoning behind why you qualify for either of these categories must also be provided); or
- The local authority itself.

More information on the [Natural Resources Plan, Plan Change 1](#) and on the [consultation and submission processes](#) please visit our website.

## How to make a Further Submission:

1. You can use the [online submission portal](#); or
  2. You can use the Further Submission Form(s) (Form 6).
    - [This](#) Further Submission Form(s) (Form 6) – Microsoft Word version; or
    - [Further Submission Form\(s\) \(Form 6\) – Microsoft Excel version](#).
- Please send the Further Submission Form in by one of the below methods:
- Email it to the [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz).
  - Post it to: [PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Advisor](#).
  - Drop it off at reception at one of our offices, marked ATT: Hearings Advisor.

Due to delays in postal services and the timeframe for making Further Submissions, we highly recommend that an electronic copy of your Further Submission is provided by the closing date.

## Further Submission Form requirements:

- All sections of this form need to be completed for the Further Submission to be accepted.
- You must send a copy of your Further Submission to the original submitter.  
Any person making a Further Submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington. Each submitter has an address for service available on our [website](#). If you have made a Further Submission on several original submissions, then copies of your Further Submission will need to be served with each original submitter.

1. Details of further submitter	
Name of Submitter: (First and last name, or organisation / company)	Transpower New Zealand Limited
Address for service: (Email, or physical address) Please note an <u>email address</u> is the preferred method	Environment.Policy@transpower.co.nz
Phone: (Optional)	
Contact person for submission: (If different to above)	Rebecca Eng
I wish to be heard in support of my submission at a hearing:	Yes

I would consider presenting a joint case at the hearing with others who make a similar submission:	No
<b>2. Criteria applicable to Further Submitter:</b>	
Only certain people may make further submissions Please select the option that applies to you:	
A) I am a person representing a relevant aspect of the public interest; or	No
B) I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or	Yes
C) I am the local authority for the relevant area.	No
Specify the reasoning behind why you qualify for either of these above options:	Transpower is potentially affected by the content of the submissions that it is submitting on.

<b>3. For the further submitter to action</b>
<p>Service of your further submission:</p> <p>Please note that any person making a further submission <b>must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.</b></p> <p>Each submitter has an address for service available at: <a href="http://www.gw.govt.nz/nrp-pc1-submissions">www.gw.govt.nz/nrp-pc1-submissions</a>.</p> <p>If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.</p>

<b>4. Disclosures:</b>		
If submitting on behalf of a company / organisation: I confirm that I have permission to provide this information on behalf of the company / organisation	Signature	8 March 2024
<p><b>Public information:</b></p> <p>Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website.</p> <p>In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the <a href="#">Plan Change 1 to the Natural Resources Plan Information Statement</a>.</p> <p>You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at <a href="mailto:privacy@gw.govt.nz">privacy@gw.govt.nz</a>.</p>		

<b>5. Further Submission:</b>
<ul style="list-style-type: none"> <li>• The original submissions received have been summarised into submission points and collated into one summary table. This document(s) is a Summary of Decisions Requested: <ul style="list-style-type: none"> <li>○ <a href="#">NRP PC 1 - Summary of Decisions Requested – By Submitter</a></li> <li>○ <a href="#">NRP PC 1 - Summary of Decisions Requested – By Provision</a></li> </ul> </li> <li>• Further submitters can submit on multiple submission points (identified in the Summary of Decisions Requested above) within the following section. Please use additional pages if necessary.</li> <li>• If you are providing suggested text amendments to a provision, please do so in the following format: <ul style="list-style-type: none"> <li>Suggested added text, shown as <b>bolded text</b> format</li> <li>Suggested deleted text, shown as <del>struckthrough</del> format</li> </ul> </li> </ul>

**Please enter further submission points in the table on the following page(s)**

#### 4. Further submission points

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

*Submitter name or, Submitter number of the submission you are commenting on:	*Submission point number: <i>Unique identifying number allocated to each specific <u>submission point</u>, located in the second column of the summary of decisions requested table:</i>	*Stance on the submission point: <i>(Support, Oppose, Oppose in part, Support in part, Not stated)</i>	*Decision sought: <i>(Allow, Disallow, Allow in part, or Disallow in part)</i>	Decision sought <i>Illustrate which aspects of this original submission that you support or oppose.  Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i>	Reasons: <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i>
<b>S041 (Chorus New Zealand Limited and others)</b>					
S041 (Chorus New Zealand Limited and others)	S41.004	Support in part	Allow in part	Transpower supports excluding “thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance” from earthworks rule WH.R23.	Transpower considers the exclusions sought for cable laying and pipe maintenance better recognises and provides for cable or pipe laying that may be associated with the maintenance, upgrading, or development of regionally significant infrastructure.
S041 (Chorus New Zealand Limited and others)	S41.008	Support in part	Allow in part	Transpower supports excluding “thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance” from earthworks rule P.R22.	Transpower considers the exclusions sought for cable laying and pipe maintenance better recognises and provides for cable or pipe laying that may be associated with the maintenance, upgrading, or development of regionally significant infrastructure.
<b>S222 (Environmental Defence Society Inc.)</b>					
S222 (Environmental Defence Society Inc.)	S222.023	Oppose in part	Disallow in part	Transpower opposes the request to include reference to natural form and character in objective WH.O2.	Refer to Transpower’s submission on objective WH.O1. The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable

					objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.
S222 (Environmental Defence Society Inc.)	S222.032	Oppose	Disallow	Transpower opposes the request to include reference to natural form and character in objective WH.O9.	Refer to Transpower's submission on objective WH.O1. The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.
S222 (Environmental Defence Society Inc.)	S222.033	Oppose in part	Disallow in part	Transpower opposes the request to include target attribute states for natural form and character in table 8.4 (or any added table).	Refer to Transpower's submission on objective WH.O1. The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.
S222 (Environmental Defence Society Inc.)	S222.034	Oppose in part	Disallow in part	Transpower opposes the request to include "restoring... natural form and character" in policy WH.P1.	Refer to Transpower's submission on objective WH.O1. The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.
S222 (Environmental Defence Society Inc.)	S222.057	Oppose	Disallow	Transpower opposes the request to change activity status of rule WH.R17 from permitted to controlled.	Refer to Transpower's submission on rule WH.R17. The decision requested does not provide for vegetation clearance for the purpose of maintaining or operating the National Grid.

					However, if the decision requested by Transpower in its submission on rule WH.R17 is allowed, then Transpower would adopt a neutral position on this submission point.
S222 (Environmental Defence Society Inc.)	S222.058	Oppose	Disallow	Transpower opposes the request to change activity status of rule WH.R18 from controlled to discretionary or restricted discretionary.	Refer to Transpower's submission on rule WH.R17. The decision requested does not provide for vegetation clearance for the purpose of maintaining or operating the National Grid, where this breaches the standards in rule WH.R17. However, if the decision requested by Transpower in its submission on rule WH.R17 is allowed, then Transpower would adopt a neutral position on this submission point.
S222 (Environmental Defence Society Inc.)	S222.063	Oppose in part	Disallow in part	Transpower opposes the request to increase the setback of earthworks from waterbodies and the coastal marine area under rule WH.R23.	The setback provided in the notified rule is consistent with the setback for earthworks provided for in the operative NRP. It is unclear what setback is requested by the submitter, and what justification there is for any increased setback.
S222 (Environmental Defence Society Inc.)	S022.064	Oppose in part	Disallow in part	Transpower opposes the request to change the activity status of earthworks rule WH.R24 from restricted discretionary to discretionary.	Subject to the decision requested by Transpower in its submission on rule WH.R24 being allowed, Transpower considers that the matters of discretion recognise an appropriate range of potential adverse effects associated with earthworks. On this basis, Transpower considers that discretionary activity status is unjustified.
S222 (Environmental Defence Society Inc.)	S022.076	Oppose in part	Disallow in part	Transpower opposes the request to include reference to natural form and character in objective P.O2.	Refer to Transpower's submission on objective P.O1. The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is

					located over or within freshwater bodies or the coastal marine area.
S222 (Environmental Defence Society Inc.)	S022.079	Oppose in part	Disallow in part	Transpower opposes the request to include target attribute states for natural form and character in table 9.2 (or any added table).	Refer to Transpower's submission on objective P.O1. The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.
S222 (Environmental Defence Society Inc.)	S022.080	Oppose in part	Disallow in part	Transpower opposes the request to include "restoring... natural form and character" in policy P.P1.	Refer to Transpower's submission on objective P.O1. The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.
S222 (Environmental Defence Society Inc.)	S022.099	Oppose	Disallow	Transpower opposes the request to change activity status of rule P.R16 from permitted to controlled.	Refer to Transpower's submission on rule P.R16. The decision requested does not provide for vegetation clearance for the purpose of maintaining or operating the National Grid. However, if the decision requested by Transpower in its submission on rule P.R16 is allowed, then Transpower would adopt a neutral position on this submission point.
S222 (Environmental Defence Society Inc.)	S022.100	Oppose	Disallow	Transpower opposes the request to change activity status of rule P.R17 from controlled to discretionary or restricted discretionary.	Refer to Transpower's submission on rule P.R16. The decision requested does not provide for vegetation clearance for the purpose of maintaining or operating the National Grid, where this breaches the standards in rule P.R16.



					However, if the decision requested by Transpower in its submission on rule P.R16 is allowed, then Transpower would adopt a neutral position on this submission point.
S222 (Environmental Defence Society Inc.)	S222.105	Oppose in part	Disallow in part	Transpower opposes the request to increase the setback of earthworks from waterbodies and the coastal marine area under rule P.R22.	The setback provided in the notified rule is consistent with the setback for earthworks provided for in the operative NRP. It is unclear what setback is requested by the submitter, and what justification there is for any increased setback.
S222 (Environmental Defence Society Inc.)	S222.106	Oppose in part	Disallow in part	Transpower opposes the request to change the activity status of earthworks rule P.R23 from restricted discretionary to discretionary.	Subject to the decision requested by Transpower in its submission on rule WH.R24 being allowed, Transpower considers that the matters of discretion recognise an appropriate range of potential adverse effects associated with earthworks. On this basis, Transpower considers that discretionary activity status is unjustified.
<b>S261 (Forest &amp; Bird)</b>					
S261 (Forest & Bird)	S261.002	Oppose in part	Disallow in part	Transpower opposes the request to include target attribute states for natural form and character.	Refer to Transpower's submission on objectives WH.O1 and P.O1. The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.
S261 (Forest & Bird)	S261.049	Oppose in part	Disallow in part	Transpower opposes the request to include reference to ephemeral watercourses in objective WH.O1.	Transpower opposes references to ephemeral watercourses in objective WH.O1 on the basis that ephemeral watercourses are typically not mapped and, in practice, difficult to clearly define. Further, it is unclear how the health of ephemeral watercourses would be measured in practice given that ephemeral watercourses

					only convey or retain water during or immediately after rainfall events. This introduces significant uncertainty into the scope and spatial application of the objective.
S261 (Forest & Bird)	S261.050	Oppose in part	Disallow in part	<p>Transpower opposes the request to include reference to ephemeral watercourses in objective WH.O2.</p> <p>Transpower also opposes the request to include reference to natural form and character in clause (a) of objective WH.O2.</p>	<p>Transpower opposes references to ephemeral watercourses in objective WH.O2 on the basis that ephemeral watercourses are typically not mapped and, in practice, difficult to clearly define. Further, it is unclear how the health of ephemeral watercourses would be measured in practice given that ephemeral watercourses only convey or retain water during or immediately after rainfall events. This introduces significant uncertainty into the scope and spatial application of the objective.</p> <p>With respect to natural form and character, refer to Transpower's submission on objective WH.O1. The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.</p>
S261 (Forest & Bird)	S261.060	Oppose in part	Disallow in part	<p>Transpower opposes the request to include reference to natural form and character in objective WH.O9.</p>	<p>Refer to Transpower's submission on objective WH.O1.</p> <p>The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.</p>
S261 (Forest & Bird)	S261.061	Oppose in part	Disallow in part	<p>Transpower opposes the request to include target attribute states for natural form and</p>	<p>Refer to Transpower's submission on objective WH.O1.</p>



				character in table 8.4 (or any added table).	The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.
S261 (Forest & Bird)	S261.062	Oppose in part	Disallow in part	Transpower opposes the request to include references to natural form and character in policy WH.P1.	Refer to Transpower's submission on objective WH.O1. The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.
S261 (Forest & Bird)	S261.063	Oppose in part	Disallow in part	<p>Transpower opposes the amendments requested to clause (a) of policy WH.P2.</p> <p>Transpower opposes the request to refer to ephemeral watercourses in clause (e) of policy WH.P2.</p> <p>Transpower opposes the request to include a new clause: "(i) land use intensification that individually or cumulatively may lead to a decline in water quality is prohibited".</p>	<p>With respect to the amendments requested to clause (a), Transpower opposes these on the basis that they are inconsistent with the decision requested by Transpower on clause (a).</p> <p>With respect of the amendments requested to clause (e), Transpower opposes references to ephemeral watercourses in the policy on the basis that they are typically not mapped and, in practice, difficult to clearly define. Further, it is unclear how the health of ephemeral watercourses would be measured in practice given that they only convey or retain water during or immediately after rainfall events. This introduces significant uncertainty into the scope and spatial application of the policy.</p> <p>With respect to the new clause (i) requested, Transpower opposes this on the basis that the phrase "may lead to a decline in water</p>

					quality” is highly uncertain and potentially open-ended in terms of the range of land use activities that it may apply to.
S261 (Forest & Bird)	S261.073	Oppose	Disallow	Transpower opposes the request to amend policy WH.P11 to require resource consent for all discharges of stormwater from high risk industrial or trade premises.	Subject to its submissions on the rules for discharges from high risk industrial or trade premises, Transpower considers that it is reasonable to provide for these discharges as a permitted activity (subject to appropriate standards).
S261 (Forest & Bird)	S261.075	Oppose in part	Disallow in part	Transpower opposes the request to amend policy WH.P14 to replace the word “practicable” with “possible”.	Replacing “practicable” with “possible” sets an unreasonably high threshold for the reduction of adverse effects of stormwater runoff from existing urban areas.
S261 (Forest & Bird)	S261.090	Oppose	Disallow	Transpower opposes the request to amend policy WH.P29 to increase setback distances for earthworks and refer to ephemeral watercourses.	With respect to the setback requested, the setback provided in the notified plan change is consistent with the setback for earthworks provided for in the operative NRP. It is unclear what justification there is for any increased setback (of no less than 10m)  With respect to ephemeral watercourses, Transpower opposes references to ephemeral watercourses in the policy on the basis that they are typically not mapped and, in practice, difficult to clearly define. This introduces significant uncertainty into the scope and spatial application of the policy.
S261 (Forest & Bird)	S261.099	Oppose in part	Disallow in part	Transpower opposes the request to amend the activity status of stormwater discharge rule WH.R5 from permitted to controlled.	Transpower considers that it would not be efficient or effective to require resource consent for all discharges from new or redeveloped impervious surfaces (no matter how minor).
S261 (Forest & Bird)	S261.100	Oppose in part	Disallow in part	Transpower opposes the request to amend the activity status of stormwater discharge rule WH.R6 from controlled to discretionary.	Subject to the decision requested by Transpower in its submission on rule WH.R6 being allowed, Transpower considers that the matters of control recognise an appropriate

					range of potential adverse effects associated with stormwater from new greenfield impervious surfaces. On this basis, Transpower considers that discretionary activity status is unjustified.
S261 (Forest & Bird)	S261.110	Oppose in part	Disallow in part	Transpower opposes the request to amend vegetation clearance rule WH.R17 to include the following standard: “(x) the vegetation clearance is not undertaken within, or within 10 metre setback from, a surface water body, ephemeral watercourse, or the coastal marine area”.	Transpower opposes including a setback standard for vegetation clearance on the basis that the need for such a standard, is not clearly justified.  With respect to ephemeral watercourses, Transpower opposes references to ephemeral watercourses in the rule on the basis that they are typically not mapped and, in practice, difficult to clearly define. This introduces significant uncertainty into the scope and spatial application of the rule.
S261 (Forest & Bird)	S261.111	Oppose	Disallow	Transpower opposes the request to reclassify vegetation clearance rule WH.R18 as a discretionary activity.  Transpower opposes the alternative request to include “adverse effects on the environment” as a matter of discretion.	Subject to the decision requested by Transpower in its submission on rule WH.R18 being allowed, Transpower considers that the matters of discretion recognise an appropriate range of potential adverse effects associated with vegetation clearance. On this basis, Transpower considers that discretionary activity status is unjustified.  Transpower opposes the alternative request to include “adverse effects on the environment” as a matter of discretion, as this is an overly broad matter of discretion that effectively makes the activity a discretionary activity.
S261 (Forest & Bird)	S261.116	Oppose in part	Disallow in part	Transpower opposes the request to amend earthworks rule WH.R23 to increase the setback for earthworks from 5m to 10m.	With respect to the setback requested, the setback provided in the notified plan change is consistent with the setback for earthworks provided for in the operative NRP. It is unclear

				Transpower opposes the request to amend earthworks rule WH.R23 to refer to ephemeral watercourses.	<p>what justification there is for any increased setback.</p> <p>With respect to ephemeral watercourses, Transpower opposes references to ephemeral watercourses in the rule on the basis that they are typically not mapped and, in practice, difficult to clearly define. This introduces significant uncertainty into the scope and spatial application of the rule.</p>
S261 (Forest & Bird)	S261.117	Oppose	Disallow	Transpower opposes the request to amend the activity status of earthworks rule WH.R24 from restricted discretionary to discretionary.	Subject to the decision requested by Transpower in its submission on rule WH.R24 being allowed, Transpower considers that the matters of discretion recognise an appropriate range of potential adverse effects associated with earthworks. On this basis, Transpower considers that discretionary activity status is unjustified.
S261 (Forest & Bird)	S261.133	Oppose in part	Disallow in part	Transpower opposes the request to include reference to ephemeral watercourses in objective P.O1.	Transpower opposes references to ephemeral watercourses in objective P.O1 on the basis that ephemeral watercourses are typically not mapped and, in practice, difficult to clearly define. Further, it is unclear how the health of ephemeral watercourses would be measured in practice given that ephemeral watercourses only convey or retain water during or immediately after rainfall events. This introduces significant uncertainty into the scope and spatial application of the objective.
S261 (Forest & Bird)	S261.134	Oppose in part	Disallow in part	<p>Transpower opposes the request to include reference to ephemeral watercourses in objective P.O2.</p> <p>Transpower also opposes the request to include reference to natural form and character in clause (a) of objective P.O2.</p>	Transpower opposes references to ephemeral watercourses in objective P.O2 on the basis that ephemeral watercourses are typically not mapped and, in practice, difficult to clearly define. Further, it is unclear how the health of ephemeral watercourses would be measured in practice given that ephemeral watercourses

					<p>only convey or retain water during or immediately after rainfall events. This introduces significant uncertainty into the scope and spatial application of the objective.</p> <p>With respect to natural form and character, refer to Transpower's submission on objective P.O1. The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.</p>
S261 (Forest & Bird)	S261.139	Oppose in part	Disallow in part	Transpower opposes the request to include reference to natural form and character in objective P.O6.	<p>Refer to Transpower's submission on objective P.O1.</p> <p>The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.</p>
S261 (Forest & Bird)	S261.140	Oppose in part	Disallow in part	Transpower opposes the request to include target attribute states for natural form and character in table 9.2 (or any added table).	<p>Refer to Transpower's submission on objective P.O1.</p> <p>The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.</p>
S261 (Forest & Bird)	S261.141	Oppose in part	Disallow in part	Transpower opposes the request to include references to natural form and character in policy P.P1.	<p>Refer to Transpower's submission on objective P.O1.</p> <p>The restoration of natural character in relation to all freshwater bodies and the coastal</p>

					marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.
S261 (Forest & Bird)	S261.142	Oppose in part	Disallow in part	<p>Transpower opposes the amendments requested to clause (a) of policy P.P2.</p> <p>Transpower opposes the request to refer to ephemeral watercourses in clause (e) of policy P.P2.</p> <p>Transpower opposes the request to include a new clause: “(i) land use intensification that individually or cumulatively may lead to a decline in water quality is prohibited”.</p>	<p>With respect to the amendments requested to clause (a), Transpower opposes these on the basis that they are inconsistent with the decision requested by Transpower on clause (a).</p> <p>With respect of the amendments requested to clause (e), Transpower opposes references to ephemeral watercourses in the policy on the basis that they are typically not mapped and, in practice, difficult to clearly define. Further, it is unclear how the health of ephemeral watercourses would be measured in practice given that they only convey or retain water during or immediately after rainfall events. This introduces significant uncertainty into the scope and spatial application of the policy.</p> <p>With respect to the new clause (i) requested, Transpower opposes this on the basis that the phrase “may lead to a decline in water quality” is highly uncertain and potentially open-ended in terms of the range of land use activities that it may apply to.</p>
S261 (Forest & Bird)	S261.152	Oppose	Disallow	Transpower opposes the request to amend policy P.P10 to replace the word “practicable” with “possible”.	Replacing “practicable” with “possible” sets an unreasonably high requirement for the management of various effects across the range of matters where the term “practicable” is referred to.
S261 (Forest & Bird)	S261.153	Oppose	Disallow	Transpower opposes the request to amend policy P.P11 to require resource consent	Subject to its submissions on the rules for discharges from high risk industrial or trade



				for all discharges of stormwater from high risk industrial or trade premises.	premises, Transpower considers that it is reasonable to provide for these discharges as a permitted activity (subject to appropriate standards).
S261 (Forest & Bird)	S261.155	Oppose in part	Disallow in part	Transpower opposes the request to amend policy P.P13 to replace the word “practicable” with “possible”.	Replacing “practicable” with “possible” sets an unreasonably high threshold for the reduction of adverse effects of stormwater runoff from existing urban areas.
S261 (Forest & Bird)	S261.169	Oppose	Disallow	Transpower opposes the request to amend policy P.P27 to increase setback distances for earthworks and refer to ephemeral watercourses.	With respect to the setback requested, the setback provided in the notified plan change is consistent with the setback for earthworks provided for in the operative NRP. It is unclear what justification there is for any increased setback.  With respect to ephemeral watercourses, Transpower opposes references to ephemeral watercourses in the policy on the basis that they are typically not mapped and, in practice, difficult to clearly define. This introduces significant uncertainty into the scope and spatial application of the policy.
S261 (Forest & Bird)	S261.176	Oppose in part	Disallow in part	Transpower opposes the request to amend the activity status of stormwater discharge rule P.R5 from permitted to controlled.	Transpower considers that it would not be efficient or effective to require resource consent for all discharges from new or redeveloped impervious surfaces (no matter how minor).
S261 (Forest & Bird)	S261.177	Oppose in part	Disallow in part	Transpower opposes the request to amend the activity status of stormwater discharge rule WH.R6 from controlled to discretionary.	Subject to the decision requested by Transpower in its submission on rule WH.R6 being allowed, Transpower considers that the matters of control recognise an appropriate range of potential adverse effects associated with stormwater from new greenfield impervious surfaces. On this basis, Transpower considers that discretionary activity status is unjustified.

S261 (Forest & Bird)	S261.178	Oppose	Disallow	Transpower opposes the request to amend the activity status of stormwater discharge rule P.R7 from controlled to restricted discretionary.	Transpower considers that controlled activity status provides sufficient ability to impose conditions on consents to manage the potential adverse effects of stormwater runoff from new and redeveloped impervious surfaces in existing urban areas.
S261 (Forest & Bird)	S261.187	Oppose in part	Disallow in part	Transpower opposes the request to amend vegetation clearance rule P.R16 to include the following standard: “(x) the vegetation clearance is not undertaken within, or within 10 metre setback from, a surface water body, ephemeral watercourse, or the coastal marine area”.	Transpower opposes including a setback standard for vegetation clearance on the basis that the need for such a standard, is not clearly justified.  With respect to ephemeral watercourses, Transpower opposes references to ephemeral watercourses in the rule on the basis that they are typically not mapped and, in practice, difficult to clearly define. This introduces significant uncertainty into the scope and spatial application of the rule.
S261 (Forest & Bird)	S261.188	Oppose	Disallow	Transpower opposes the request to reclassify vegetation clearance rule P.R17 as a discretionary activity.  Transpower opposes the alternative request to include “adverse effects on the environment” as a matter of discretion.	Subject to the decision requested by Transpower in its submission on rule P.R17 being allowed, Transpower considers that the matters of discretion recognise an appropriate range of potential adverse effects associated with vegetation clearance. On this basis, Transpower considers that discretionary activity status is unjustified.  Transpower opposes the alternative request to include “adverse effects on the environment” as a matter of discretion, as this is an overly broad matter of discretion that effectively makes the activity a discretionary activity.
S261 (Forest & Bird)	S261.193	Oppose in part	Disallow in part	Transpower opposes the request to amend earthworks rule P.R22 to increase the setback for earthworks from 5m to 10m.	With respect to the setback requested, the setback provided in the notified plan change is consistent with the setback for earthworks

				Transpower opposes the request to amend earthworks rule P.R22 to refer to ephemeral watercourses.	provided for in the operative NRP. It is unclear what justification there is for any increased setback.  With respect to ephemeral watercourses, Transpower opposes references to ephemeral watercourses in the rule on the basis that they are typically not mapped and, in practice, difficult to clearly define. This introduces significant uncertainty into the scope and spatial application of the rule.
S261 (Forest & Bird)	S261.194	Oppose	Disallow	Transpower opposes the request to amend the activity status of earthworks rule P.R23 from restricted discretionary to discretionary.	Subject to the decision requested by Transpower in its submission on rule P.R23 being allowed, Transpower considers that the matters of discretion recognise an appropriate range of potential adverse effects associated with earthworks. On this basis, Transpower considers that discretionary activity status is unjustified.
<b>S238 (Greater Wellington Regional Council)</b>					
S238 (Greater Wellington Regional Council)	S238.002	Support in part	Allow in part	Transpower considers that if a definition of “urban zones” is to be included in the Plan, that the definition must also include the following text at the end: “open space zones and sport and active recreation zones that adjoin the zones listed above”.	Open space zones and sport and active recreation zones that adjoin other urban zones are a contiguous part of the urban environment, and this should be recognised in the definition.  While Transpower’s submission seeks that the National Grid is excluded from the rules associated with unplanned greenfield development, or alternatively that these rules are deleted, Transpower also supports a review of the maps should the rules and associated maps be retained. Several National Grid assets (including substations, National Grid lines, and National Grid support

					structures) are located within open space zones identified in the maps as “unplanned greenfield development areas”. As a consequence, the rules associated with unplanned greenfield development could prohibit the upgrading or development of the National Grid in these areas.
<b>S211 (Hutt City Council)</b>					
S211 (Hutt City Council)	S211.023	Support	Allow	Transpower supports the request to add the following exclusion to earthworks rule WH.R23: “Note: this rule excludes repair or maintenance of existing roads, or repair, sealing or resealing of a road, footpath or driveway.”	Transpower considers that the exclusion would appropriately enable maintenance and repair of roads, footpaths, or driveways that provide access to regionally significant infrastructure (including the National Grid).
<b>S257 (Kāinga Ora)</b>					
S257 (Kāinga Ora)	S257.004	Support	Allow	Transpower supports the request to amend the definition of hydrological control (and/or associated rules) to provide greater clarity as to what constitutes a hydrological control.	Transpower considers that greater clarity as to what constitutes hydrological control (for example, by setting out acceptable/permitted technical solutions within the Plan) will provide greater certainty and efficiency for plan users and the Council, as it would reduce the need for specific engineering design (particularly for the development/redevelopment of smaller impervious surfaces).
S257 (Kāinga Ora)	S257.005	Support in part	Allow in part	Transpower supports the request to amend the text of policy WH.P14 (stormwater discharges from new and redeveloped impervious surfaces) so that it has a greater “policy focus”.	The policy is currently constructed as if it were a set of standards in a rule. Transpower supports redrafting the policy so that it has a clearer focus on the effects sought to be managed by the standards in the rules associated with impervious surfaces, rather than simply repeating those standards.
S257 (Kāinga Ora)	S257.028	Support in	Allow in part	Transpower supports the request to	Transpower considers that increasing the

Ora)		part		amend rule WH.R5 to increase the permitted activity impervious surface threshold from 1,000m <sup>2</sup> to at least 5,000m <sup>2</sup> , and to clarify that the threshold applies only to new/additional areas of impervious surface.	threshold and clarifying that it applies only to new/additional impervious surface, would better provide for the development or redevelopment of impervious surfaces that support, provide access to, or are otherwise a part of regionally significant infrastructure (including the National Grid).
S257 (Kāinga Ora)	S257.029	Support in part	Allow in part	Transpower supports the request the amend rule WH.R6 to increase the controlled activity impervious surface threshold for new greenfield impervious surfaces from 3,000m <sup>2</sup> to at least 5,000m <sup>2</sup> .	Transpower considers that increasing the threshold would better provide for the development of impervious surfaces that support, provide access to, or are otherwise a part of regionally significant infrastructure (including the National Grid).
S257 (Kāinga Ora)	S257.030	Support in part	Allow in part	Transpower supports the request the amend rule WH.R7 to increase the controlled activity impervious surface threshold for new or redeveloped impervious surfaces in existing urban areas from 3,000m <sup>2</sup> to at least 5,000m <sup>2</sup> .	Transpower considers that increasing the threshold would better provide for the development or redevelopment of impervious surfaces that support, provide access to, or are otherwise a part of regionally significant infrastructure (including the National Grid).
S257 (Kāinga Ora)	S257.031	Support in part	Allow in part	<p>Transpower supports the request the amend rule WH.R11 to increase the discretionary activity impervious surface threshold for new or redeveloped impervious surfaces from 3,000m<sup>2</sup> to at least 5,000m<sup>2</sup>.</p> <p>Transpower supports the request to amend the activity status of rule WH.R11 from discretionary to restricted discretionary.</p>	<p>Transpower considers that increasing the threshold would better provide for the development or redevelopment of impervious surfaces that support, provide access to, or are otherwise a part of regionally significant infrastructure (including the National Grid).</p> <p>With respect to the request to change the activity status of the rule from discretionary to restricted discretionary, Transpower supports this subject to the rule including a matter of discretion that recognises the benefits that the development or redevelopment of impervious surfaces has for the operation, maintenance, upgrading, or development of regionally significant infrastructure.</p>

S257 (Kāinga Ora)	S257.035	Support	Allow	Transpower supports the request to amend rule WH.R18 (and consequently WH.R17) to increase the threshold of vegetation clearance before consent is required as a controlled activity.	The submission is in general alignment with Transpower's submission on rule WH.R17.
S257 (Kāinga Ora)	S257.036	Support	Allow	<p>Transpower supports the request to exempt activities associated with the trenching of services from earthworks rule WH.R23.</p> <p>Transpower supports the request to delete clause (c)(iv) from rule WH.R23.</p>	<p>Transpower considers the exemptions sought for trenching of services better recognises and provides for trenching of services that may be associated with the maintenance, upgrading, or development of regionally significant infrastructure.</p> <p>With respect to the request to delete clause (c)(iv) from rule WH.R23, this request is consistent with the decision requested by Transpower in its submission.</p>
S257 (Kāinga Ora)	S257.037	Support	Allow	<p>Transpower supports the request to exempt activities associated with the trenching of services from earthworks rule WH.R24.</p> <p>Transpower supports the request to delete clause (b) (which relates to the winter shut-down of earthworks) and provide for winter earthworks as a matter of discretion under the relevant restricted discretionary activity rule.</p>	<p>Transpower considers the exemptions sought for trenching of services better recognises and provides for trenching of services that may be associated with the maintenance, upgrading, or development of regionally significant infrastructure.</p> <p>With respect to the request to delete clause (b) and provide for winter earthworks as a matter of discretion under the relevant restricted discretionary activity rule, this request is general consistent with the decisions requested by Transpower in its submission.</p>
S257 (Kāinga Ora)	S257.038	Support	Allow	Transpower supports the request to delete earthworks rule WH.R25 (non-complying activity rule for earthworks), and instead provide for the consideration of winter earthworks as a matter of discretion under the relevant restricted discretionary	This request is general consistent with the decisions requested by Transpower in its submission.



				activity rule.	
S257 (Kāinga Ora)	S257.056	Support in part	Allow in part	Transpower supports the request to amend rule P.R5 to increase the permitted activity impervious surface threshold from 1,000m <sup>2</sup> to at least 5,000m <sup>2</sup> , and to clarify that the threshold applies only to new/additional areas of impervious surface.	Transpower considers that increasing the threshold and clarifying that it applies only to new/additional impervious surface, would better provide for the development or redevelopment of impervious surfaces that support, provide access to, or are otherwise a part of regionally significant infrastructure (including the National Grid).
S257 (Kāinga Ora)	S257.057	Support in part	Allow in part	Transpower supports the request the amend rule P.R6 to increase the controlled activity impervious surface threshold for new greenfield impervious surfaces from 3,000m <sup>2</sup> to at least 5,000m <sup>2</sup> .	Transpower considers that increasing the threshold would better provide for the development of impervious surfaces that support, provide access to, or are otherwise a part of regionally significant infrastructure (including the National Grid).
S257 (Kāinga Ora)	S257.058	Support in part	Allow in part	Transpower supports the request the amend rule P.R7 to increase the controlled activity impervious surface threshold for new or redeveloped impervious surfaces in existing urban areas from 3,000m <sup>2</sup> to at least 5,000m <sup>2</sup> .	Transpower considers that increasing the threshold would better provide for the development or redevelopment of impervious surfaces that support, provide access to, or are otherwise a part of regionally significant infrastructure (including the National Grid).
S257 (Kāinga Ora)	S257.059	Support in part	Allow in part	Transpower supports the request the amend rule P.R10 to increase the discretionary activity impervious surface threshold for new or redeveloped impervious surfaces from 3,000m <sup>2</sup> to at least 5,000m <sup>2</sup> .  Transpower supports the request to amend the activity status of rule P.R10 from discretionary to restricted discretionary.	Transpower considers that increasing the threshold would better provide for the development or redevelopment of impervious surfaces that support, provide access to, or are otherwise a part of regionally significant infrastructure (including the National Grid).  With respect to the request to change the activity status of the rule from discretionary to restricted discretionary, Transpower supports this subject to the rule including a matter of

					discretion that recognises the benefits that the development or redevelopment of impervious surfaces has for the operation, maintenance, upgrading, or development of regionally significant infrastructure.
S257 (Kāinga Ora)	S257.063	Support	Allow	Transpower supports the request to amend rule P.R17 (and consequently P.R16) to increase the threshold of vegetation clearance before consent is required as a controlled activity.	The submission is in general alignment with Transpower's submission on rule P.R16.
S257 (Kāinga Ora)	S257.064	Support	Allow	<p>Transpower supports the request to exempt activities associated with the trenching of services from earthworks rule P.R22.</p> <p>Transpower supports the request to delete clause (c)(iv) from rule P.R22.</p>	<p>Transpower considers the exemptions sought for trenching of services better recognises and provides for trenching of services that may be associated with the maintenance, upgrading, or development of regionally significant infrastructure.</p> <p>With respect to the request to delete clause (c)(iv) from rule P.R22, this request is consistent with the decision requested by Transpower in its submission.</p>
S257 (Kāinga Ora)	S257.065	Support	Allow	<p>Transpower supports the request to exempt activities associated with the trenching of services from earthworks rule P.R23.</p> <p>Transpower supports the request to delete clause (b) (which relates to the winter shut-down of earthworks) and provide for winter earthworks as a matter of discretion under the relevant restricted discretionary activity rule.</p>	<p>Transpower considers the exemptions sought for trenching of services better recognises and provides for trenching of services that may be associated with the maintenance, upgrading, or development of regionally significant infrastructure.</p> <p>With respect to the request to delete clause (b) and provide for winter earthworks as a matter of discretion under the relevant restricted discretionary activity rule, this request is general consistent with the decisions requested by Transpower in its submission.</p>

S257 (Kāinga Ora)	S257.066	Support	Allow	Transpower supports the request to delete earthworks rule P.R24 (non-complying activity rule for earthworks), and instead provide for the consideration of winter earthworks as a matter of discretion under the relevant restricted discretionary activity rule.	This request is general consistent with the decisions requested by Transpower in its submission.
S257 (Kāinga Ora)	S257.068	Support in part	Allow in part	Should maps 86, 87, 88, and 89 (unplanned greenfield development areas) be retained, Transpower supports the request to review these maps, and to exclude land zoned as open space from “unplanned greenfield areas”, where these are located within or adjacent to an urban environment.	While Transpower’s submission seeks that the National Grid is excluded from the rules associated with unplanned greenfield development, or alternatively that these rules are deleted, Transpower also supports are review of the maps should the rules and associated maps be retained be retained. Several National Grid assets (including substations, National Grid lines, and National Grid support structures) are located within open space zones identified in the maps as “unplanned greenfield development areas”. As a consequence, the rules associated with unplanned greenfield development could prohibit the upgrading or development of the National Grid in these areas.
S257 (Kāinga Ora)	S257.069	Support in part	Allow in part	Should maps 86, 87, 88, and 89 (unplanned greenfield development areas) be retained, Transpower supports the request to review these maps, and to exclude land zoned as open space from “unplanned greenfield areas”, where these are located within or adjacent to an urban environment.	While Transpower’s submission seeks that the National Grid is excluded from the rules associated with unplanned greenfield development, or alternatively that these rules are deleted, Transpower also supports are review of the maps should the rules and associated maps be retained be retained. Several National Grid assets (including substations, National Grid lines, and National Grid support structures) are located within open space zones identified in the maps as “unplanned greenfield development areas”. As a consequence, the rules associated with unplanned greenfield development could

					prohibit the upgrading or development of the National Grid in these areas.
S257 (Kāinga Ora)	S257.070	Support in part	Allow in part	Should maps 86, 87, 88, and 89 (unplanned greenfield development areas) be retained, Transpower supports the request to review these maps, and to exclude land zoned as open space from “unplanned greenfield areas”, where these are located within or adjacent to an urban environment.	While Transpower’s submission seeks that the National Grid is excluded from the rules associated with unplanned greenfield development, or alternatively that these rules are deleted, Transpower also supports are review of the maps should the rules and associated maps be retained be retained. Several National Grid assets (including substations, National Grid lines, and National Grid support structures) are located within open space zones identified in the maps as “unplanned greenfield development areas”. As a consequence, the rules associated with unplanned greenfield development could prohibit the upgrading or development of the National Grid in these areas.
S257 (Kāinga Ora)	S257.071	Support in part	Allow in part	Should maps 86, 87, 88, and 89 (unplanned greenfield development areas) be retained, Transpower supports the request to review these maps, and to exclude land zoned as open space from “unplanned greenfield areas”, where these are located within or adjacent to an urban environment.	While Transpower’s submission seeks that the National Grid is excluded from the rules associated with unplanned greenfield development, or alternatively that these rules are deleted, Transpower also supports are review of the maps should the rules and associated maps be retained be retained. Several National Grid assets (including substations, National Grid lines, and National Grid support structures) are located within open space zones identified in the maps as “unplanned greenfield development areas”. As a consequence, the rules associated with unplanned greenfield development could prohibit the upgrading or development of the National Grid in these areas.

S257 (Kāinga Ora)	S257.073	Oppose	Disallow	Transpower opposes the request to delete maps 91 and 94 (highest erosion risk land (woody vegetation)) and replacing these with a definition for “high and highest risk erosion land”.	Transpower considers that a mapped approach (subject to Transpower’s submissions on maps 91 and 94) provides more certainty than a definition. Depending on how any definition is framed, it may be subject to a broad range of interpretations, which could reduce certainty of interpretation for plan users and Council officers when identifying areas subject to the relevant vegetation clearance rules.
S257 (Kāinga Ora)	S257.076	Oppose	Disallow	Transpower opposes the request to delete maps 91 and 94 (highest erosion risk land (woody vegetation)) and replacing these with a definition for “high and highest risk erosion land”.	Transpower considers that a mapped approach (subject to Transpower’s submissions on maps 91 and 94) provides more certainty than a definition. Depending on how any definition is framed, it may be subject to a broad range of interpretations, which could reduce certainty of interpretation for plan users and Council officers when identifying areas subject to the relevant vegetation clearance rules.
<b>S286 (Taranaki Whānui)</b>					
S286 (Taranaki Whānui)	S286.041	Support	Allow	Transpower supports the request to develop a more comprehensive framework for hydrological control and water sensitive urban design measures, including acceptable technical solutions.	Transpower considers that a comprehensive framework for hydrological control and water sensitive urban design measures, including acceptable technical solutions, will provide greater certainty and efficiency for plan users by reducing the need for plan users to rely on specific engineering design in order to provide effective hydrological control and water sensitive urban design measures.
S286 (Taranaki Whānui)	S286.045	Support	Allow	Transpower supports the request to develop a more comprehensive framework for hydrological control and water sensitive urban design measures, including acceptable technical solutions.	Transpower considers that a comprehensive framework for hydrological control and water sensitive urban design measures, including acceptable technical solutions, will provide greater certainty and efficiency for plan users

					by reducing the need for plan users to rely on specific engineering design in order to provide effective hydrological control and water sensitive urban design measures.
S286 (Taranaki Whānui)	S286.069	Support	Allow	Transpower supports the request to develop a more comprehensive framework for hydrological control and water sensitive urban design measures, including acceptable technical solutions.	Transpower considers that a comprehensive framework for hydrological control and water sensitive urban design measures, including acceptable technical solutions, will provide greater certainty and efficiency for plan users by reducing the need for plan users to rely on specific engineering design in order to provide effective hydrological control and water sensitive urban design measures.
S286 (Taranaki Whānui)	S286.070	Support	Allow	Transpower supports the request to develop a more comprehensive framework for hydrological control and water sensitive urban design measures, including acceptable technical solutions.	Transpower considers that a comprehensive framework for hydrological control and water sensitive urban design measures, including acceptable technical solutions, will provide greater certainty and efficiency for plan users by reducing the need for plan users to rely on specific engineering design in order to provide effective hydrological control and water sensitive urban design measures.
S286 (Taranaki Whānui)	S286.071	Support	Allow	Transpower supports the request to develop a more comprehensive framework for hydrological control and water sensitive urban design measures, including acceptable technical solutions.	Transpower considers that a comprehensive framework for hydrological control and water sensitive urban design measures, including acceptable technical solutions, will provide greater certainty and efficiency for plan users by reducing the need for plan users to rely on specific engineering design in order to provide effective hydrological control and water sensitive urban design measures.
<b>S275 (The New Zealand Transport Agency)</b>					
S275 (The New Zealand Transport)	S275.003	Support	Allow	Transpower supports the request to provide for the exclusions (as set out under clause (d) of the operative definition of	The decision requested is consistent with the decisions requested in Transpower's submission on the definition of "earthworks".



Agency)				“earthworks”) to enable construction, repair, upgrade or maintenance of infrastructure.	
<b>S33 (Wellington City Council)</b>					
S33 (Wellington City Council)	S33.010	Support	Allow	Transpower supports the request to clarify scale or metric thresholds where activities would be regulated under the definition of “high risk industrial or trade premise”.	Subject to detail, Transpower supports appropriate scale or metric thresholds as part of the definition of “high risk industrial or trade premise” as this could provide greater certainty to plan users as to the scale and scope of activities that are covered by the definition.
<b>S151 (Wellington Water Ltd)</b>					
S151 (Wellington Water Ltd)	S151.005	Support	Allow	Transpower supports the request to exempt regionally significant infrastructure from the winter shutdown for earthworks.	The request is generally consistent with Transpower’s submissions on the provisions associated with earthworks.
S151 (Wellington Water Ltd)	S151.018	Support	Allow	Transpower supports the request to retain the operative definition of “earthworks” (and delete the proposed definition of “earthworks”).	The request is generally consistent with Transpower’s submissions on the definition of “earthworks”. Specifically, this request would enable the exemptions for regionally significant infrastructure under clause (d) of the operative definition to continue to apply.
S151 (Wellington Water Ltd)	S151.089	Support	Allow	Should the winter shut down of earthworks set out in policy WH.P31 be retained, Transpower supports the request to provide an exemption for regionally significant infrastructure from the policy.	The request is generally consistent with Transpower’s submissions on policy WH.P31.
S151 (Wellington Water Ltd)	S151.099	Support	Allow	Transpower supports the request to reinstate exemptions for certain earthworks activities under rule WH.R23, including for the thrusting, boring, trenching, or mole ploughing associated with cable or pipe laying and maintenance,	Transpower considers the exemptions sought to earthworks rule WH.R23 better recognise and provide for the maintenance, upgrading, or development of regionally significant infrastructure.

				and for the construction, repair, upgrade or maintenance of pipelines.	
S151 (Wellington Water Ltd)	S151.100	Support	Allow	Should the winter shut down of earthworks set out in rule WH.R24 be retained, Transpower supports the request to provide an exemption for regionally significant infrastructure from clause (b) of the rule.	While Transpower has sought that clause (b) of the rule is deleted, as an alternative, Transpower would support an exemption from clause (b) for regionally significant infrastructure, as providing for such an exemption would appropriately recognise and provide for earthworks associated with the maintenance, upgrading, and development of regionally significant infrastructure.
S151 (Wellington Water Ltd)	S151.122	Support	Allow	Should the winter shut down of earthworks set out in policy P.P29 be retained, Transpower supports the request to provide an exemption for regionally significant infrastructure from the policy.	The request is generally consistent with Transpower's submissions on policy P.P29.
S151 (Wellington Water Ltd)	S151.130	Support	Allow	Transpower supports the request to reinstate exemptions for certain earthworks activities under rule P.R22, including for the thrusting, boring, trenching, or mole ploughing associated with cable or pipe laying and maintenance, and for the construction, repair, upgrade or maintenance of pipelines.	Transpower considers the exemptions sought to earthworks rule P.R22 better recognise and provide for the maintenance, upgrading, or development of regionally significant infrastructure.
S151 (Wellington Water Ltd)	S151.131	Support	Allow	Should the winter shut down of earthworks set out in rule P.R23 be retained, Transpower supports the request to provide an exemption for regionally significant infrastructure from clause (b) of the rule.	While Transpower has sought that clause (b) of the rule is deleted, as an alternative, Transpower would support an exemption from clause (b) for regionally significant infrastructure, as providing for such an exemption would appropriately recognise and provide for earthworks associated with the maintenance, upgrading, and development of regionally significant infrastructure.

<p>S151 (Wellington Water Ltd)</p>	<p>S151.183</p>	<p>Support in part</p>	<p>Allow in part</p>	<p>Transpower supports the requested amendment to existing objective O9: “The social, economic, cultural and environmental benefits of Regionally Significant Infrastructure, renewable energy generation activities and the utilisation of mineral resources are <u>recognized and provided for.</u>”</p>	<p>Transpower supports the requested amendment to objective O9 as it would ensure that the benefits of regionally significant infrastructure (including the National Grid) are provided for through decision-making. This gives effect to policy 1 of the NPSET.</p>
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