

Submitter ID:

File No:

# Further Submission

## on Proposed Natural Resources Plan for the Wellington Region



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Clause 8 of Schedule 1, Resource Management Act 1991.

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

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

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

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

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

[Regionalplan@gw.govt.nz](mailto:Regionalplan@gw.govt.nz)

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FreePost Authority Number 3156



## FORM 6: FURTHER SUBMISSION FORM

This is a further submission in support of, or opposition to, a submission on the PNRP.

### A. DETAILS OF FURTHER SUBMITTER

FULL NAME

ORGANISATION (\* the organisation that this submission is made on behalf of)

ADDRESS FOR SERVICE (INCLUDING POSTCODE)

PHONE

FAX

EMAIL

### Only certain people may make further submissions

Please tick the option that applies to you:

- I am a person representing a relevant aspect of the public interest; or  
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

Specify below the grounds for saying that you are within the category you have ticked.

### Service of your further submission

Please note that you must **serve a copy of this further submission on the original submitter no later than five working days after this further submission has been provided to Wellington Regional Council.**

If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served on each original submitter.

Signature:

Date:

23-03-2016

*Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.*

### Please note

All information contained in a further submission under the Resource Management Act 1991 becomes public information. All further submissions will be put on our website and will include all personal details included in the further submission.

### B. APPEARANCE AT HEARING

Please select from the following:

- I do not wish to be heard in support of my further submission; or  
 I do wish to be heard in support of my further submission; and, if so,  
 I would be prepared to consider presenting this further submission in a joint case with others making a similar further submission at any hearing.

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

**C. FURTHER SUBMISSION POINTS**

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

| Details of the submission you are commenting on                     | Original submission number   | Position                                      | Part(s) of the submission you support or oppose  | Reasons  | Relief sought  |
|---|--|---|--|--|--|
| Name of person/group making original submission and postal address. | The original submission number can be found on the submitter address list. | Whether you support or oppose the submission. | Indicate which parts of the original submission (which submission points) you support or oppose, together with any relevant PNRP provisions. | Why you support or oppose each submission point. | The part or whole of each submission point you wish to be allowed or disallowed. |
| e.g. Joanne Bloggs<br>12 Pine Tree Avenue<br>Redwood                | e.g. submitter S102  | e.g. Oppose                                   | e.g. Oppose all of submission point S102/41  | e.g. The submission point does not recognise...  | e.g. Disallow the parts of S102/41 relating to...                                |

Please see the attached table setting out the specific further submission points of Meridian Energy Limited.



## GWRC PROPOSED NATURAL RESOURCES PLAN FOR THE WELLINGTON REGION:

### FURTHER SUBMISSION POINTS OF MERIDIAN ENERGY LIMITED (*MEL*):

| Reference          | Policy or Provision            | Submitter Name & Submission Reference        | Submitter's Submission Points   | MEL Position, Reasons and Requested Decision:  |
|--------------------|--------------------------------|--|---|--|
| <b>DEFINITIONS</b> |                                |  |   |  |
|                    | <i>Biodiversity Offset</i>     | <b>NZTA S146/008</b>                         | Requests amendment to delete requirement for no net loss and net gain such that all proposals are considered on their merit   | <b>Support:</b> MEL has an interest in the application of the principle of biodiversity offsetting within the Wellington region and nationally and, in particular, in the 'no net loss' approach.<br><b>Requests:</b> Allow the submission point or such further or other relief as will achieve the same outcome. |
|                    | <i>Biodiversity Offset</i>     | <b>Minister of Conservation S75/006</b>      | Requests amendment to emphasise no net loss and preferably a net gain of biodiversity on the ground.  | <b>Oppose:</b> MEL has an interest in the application of the principle of biodiversity offsetting within the Wellington region and nationally and, in particular, in the 'no net loss' approach.<br><b>Requests:</b> Disallow the submission.  |
|                    | <i>Operational requirement</i> | <b>Vector Gas S145/011<br/>NZTA S146/027</b> | Request amendment: <i>'When an activity needs to be carried out in a particular location or way in order to be able to function <u>safely</u>, effectively and efficiently.</i> | <b>Support:</b> The requested amended wording is a sensible addition in the context of regionally significant infrastructure and renewable energy generation activities.<br><b>Requests:</b> Allow the submission point or such further or other relief as will achieve the same outcome.                          |

| Reference         | Policy or Provision                          | Submitter Name & Submission Reference                | Submitter's Submission Points  | MEL Position, Reasons and Requested Decision:   |
|-------------------|--|--|--|---|
|                   | <i>Regionally significant infrastructure</i> | <b>Wellington Electricity Lines Limited S126/006</b> | Requests addition of: <ul style="list-style-type: none"> <li><i>facilities for the generation, transmission and distribution of electricity a network (as defined in the Electricity Industry Act 2010).</i></li> </ul>  | <b>Support:</b> The submission makes a valid point about the correct reference to relevant legislation.<br><b>Requests:</b> Allow the submission point or such further or other relief as will achieve the same outcome.  |
|                   | <i>Regionally Significant Infrastructure</i> | <b>Powerco S29/060</b>                               | Requests addition of:<br><i>'Facilities for the generation and/or transmission of electricity where it is supplied to the national electricity grid and/or the local distribution network. This includes supply within the local electricity distribution network....'</i> | <b>Support:</b> It is appropriate to explicitly include provision for electricity supply to the national grid and the local distribution network.<br><b>Requests:</b> Allow the submission point or such further or other relief as will achieve the same outcome.  |
| <b>OBJECTIVES</b> |  |  |  |   |
| <b>Objectives</b> | Requested new Objective                      | <b>NZTA S146/064</b>                                 | Add new objective: <i>'Discharges associated with regionally significant infrastructure are managed through the adoption of the best practicable option.'</i>  | <b>Support in part:</b> Experience has demonstrated that adoption of the best practicable option approach is appropriate and sustainable for electricity generation activities as examples of regionally significant infrastructure.<br><b>Requests:</b> Allow the submission point or such further or other relief as will achieve the same outcome. |
| <b>Objectives</b> | Requested new Objective                      | <b>NZTA S146/043<br/>Vector Gas Ltd S145/016</b>     | Add new objective: <i>'To recognise that regionally significant infrastructure represents appropriate use and development in all environments where there are</i>  | <b>Support in part:</b> Regionally significant infrastructure represents appropriate use and development in many environments and is subject to functional needs and operational requirements. MEL wishes to  |

| Reference         | Policy or Provision     | Submitter Name & Submission Reference                | Submitter's Submission Points   | MEL Position, Reasons and Requested Decision:   |
|-------------------|-------------------------|--|---|---|
|                   |                         |  | <i>functional needs or operational requirements.'</i>   | participate in any hearings about the wording of such an additional objective.<br><b>Requests:</b> Allow the submission point or such further or other relief as will achieve a similar outcome.  |
| <b>Objectives</b> | Requested new Objective | <b>NZTA S146/042<br/>Vector Gas Ltd S145/016</b>     | Add new objective: <i>'The safe, effective and efficient use, operation, maintenance, upgrade and development of regionally significant infrastructure is provided for.'</i>    | <b>Support:</b> Given the importance of this infrastructure, it is appropriate that the policy framework explicitly recognises and provides for new and existing regionally significant infrastructure. The One Plan Objective 3-1 provides a useful operative example and is worded: <i>'Have regard to the benefits of infrastructure and other physical resources of national importance by recognising and providing for their establishment, operation, maintenance and upgrading.'</i><br><b>Requests:</b> Allow the submission point or such further or other relief as will achieve the same outcome. |
| <b>Objectives</b> | Requested new Objective | <b>Wellington International Airport Ltd S282/005</b> | Insert new objective: <i>'Development of regionally significant infrastructure: Provide for an enable the development and growth of regionally significant infrastructure.'</i> | <b>Support:</b> Given the importance of this infrastructure, it is appropriate that the policy framework explicitly recognises and provides for new and existing regionally significant infrastructure. The One Plan Objective 3-1 provides a useful operative example and is worded: <i>'Have regard to the benefits of infrastructure and other physical resources of national importance by recognising and providing for their</i>  |

| Reference     | Policy or Provision | Submitter Name & Submission Reference  | Submitter's Submission Points   | MEL Position, Reasons and Requested Decision:  |
|---------------|---------------------|--|---|--|
|               |                     |  |   | <i>establishment, operation, maintenance and upgrading.</i><br><b>Requests:</b> Allow the submission point or such further or other relief as will achieve the same outcome.   |
| Objective 12  |                     | Spark NZ S98/005   | Add new Objective 12A: <i>'Recognise that some existing and future regionally significant infrastructure has a functional need and/or operational requirement to be located and/or operated in a particular environment.'</i> | <b>Support in part:</b> The PNRP includes definitions and policies that acknowledge the functional needs and operational requirements of regionally significant infrastructure. MEL has an interest in the wording of any such additional objective and notes that One Plan Policy 3-3 provides a potentially useful example.<br><b>Requests:</b> Allow the submission point or such further or other relief as will achieve the same outcome. |
| Objective O19 |                     | CentrePort S121/026<br>KiwiRail Holdings S140/018<br>Horticulture NZ S307/016<br>Wellington International Airport S282/011<br>Rangitane o Wairarapa S279/030 | Amend: <i>'The <del>interference</del> adverse effects from use and development on natural process is <del>minimised</del> avoided, remedied or mitigated.'</i>   | <b>Support in part:</b> The suggested alternative wording accords better with the framework of the RMA. The expression 'interference' has no clear meaning in this context.<br><b>Requests:</b> Allow the submission point or such further or other relief as will achieve the same outcome.   |
| Objective O38 |                     | NZTA S146/060<br>Dairy NZ and Fonterra S316/039<br>Mahaki Holdings S370/088 and the identical submissions of   | Delete Objective O38  | <b>Support:</b> MEL opposes Objective O38.<br><b>Requests:</b> Allow the submission point and delete Objective O38.  |

| Reference     | Policy or Provision | Submitter Name & Submission Reference  | Submitter's Submission Points  | MEL Position, Reasons and Requested Decision:  |
|---------------|---------------------|--|--|--|
|               |                     | others (please note this further submission point applies also to the identical submission points made by multiple others)   |  |  |
| Objective O38 |                     | Mahaki Holdings S370/044 and the identical submissions of others (please note this further submission point applies also to the identical submission points made by multiple others) | Amend: <i>'Identified special amenity landscape values are maintained <u>and where possible identified or enhanced over time.</u>'</i> | <b>Oppose:</b> MEL opposes Objective O38 and has requested its deletion.<br><b>Requests:</b> Disallow the submission point and delete Objective O38. |
| Objective O38 |                     | Rangitane o Wairarapa Inc. S279/048  | Provide a schedule of special amenity landscapes   | <b>Oppose:</b> MEL opposes Objective O38 and has requested its deletion.<br><b>Requests:</b> Disallow the submission point and delete Objective O38. |

| Reference  | Policy or Provision | Submitter Name & Submission Reference               | Submitter's Submission Points  | MEL Position, Reasons and Requested Decision:   |
|------------|---------------------|---|--|---|
| SCHEDULES  |                     |   |  |   |
| Schedule G |                     | Environmental Defence Society Inc.<br><br>S110/017  | Amend to include a clear distinction between mitigation and offsets based on the goal of each response action.     | <b>Neither support nor opposition:</b> MEL has an interest in the application of the principle of biodiversity offsetting within the Wellington region and nationally.<br><b>Requests:</b> MEL wishes to participate in any hearings that address the wording of the principles in Schedule G (biodiversity offsetting) and requests that any amendments accord with the amendments requested in MEL's own original submission. |
|            |                     | GBC Winstone<br><br>S66/026                         | Delete 3 (additional conservation outcomes), 4 (a) (demonstrate positive effects) and 6 (no net biodiversity loss) | <b>Support in part:</b> MEL has an interest in the application of the principle of biodiversity offsetting within the Wellington region and nationally and, in particular, in the 'no net loss' approach.<br><b>Requests:</b> Allow the submission point or such further or other relief as will achieve the same outcome.  |
|            |                     | Minister of Conservation<br><br>S75/207 and S75/208 | Amend and include direction for good practice in biodiversity mitigation   | <b>Neither support nor opposition:</b> MEL has an interest in the application of the principle of biodiversity offsetting within the Wellington region and nationally.<br><b>Requests:</b> MEL wishes to participate in any hearings that address the wording of the principles in Schedule G (biodiversity offsetting) and requests that any amendments accord with the amendments   |

| Reference        | Policy or Provision               | Submitter Name & Submission Reference            | Submitter's Submission Points   | MEL Position, Reasons and Requested Decision:   |
|------------------|-----------------------------------|--|---|---|
|                  |                                   |  |   | requested in MEL's own original submission.   |
| <b>POLICIES</b>  |                                   |  |   |   |
| <b>Policies</b>  | <i>Requested New Policy</i>       | <b>NZTA S146/078<br/>Vector Gas Ltd S145/027</b> | Add a new policy: <u>'Resource consent durations for regionally significant infrastructure applications required under ss 13, 14 and 15 of the RMA will generally be granted for the maximum period of time unless reasons are identified during the consent process that make this inappropriate.'</u>   | <b>Support:</b> The proposed approach is appropriate for regionally significant infrastructure.<br><b>Requests:</b> Allow the submission point or such further or other relief as will achieve the same outcome.  |
| <b>Policies</b>  | <i>Requested New Policy</i>       | <b>NZTA S146/075</b>                             | Add a new policy: 'Adverse effects shall generally be managed by :<br>(a) <u>Avoiding effects;</u><br>(b) <u>Where effects cannot be practically avoided, remedying them;</u><br>(c) <u>Where effects cannot be practically remedied, mitigating them; and where residual adverse effects remain, it may be appropriate to consider the use of off-sets'.</u> | <b>Support in part:</b> The proposed 'cascade' approach is broadly appropriate. However, the focus should be on avoiding significant adverse effects and on remedying or mitigating other adverse effects as opposed to a focus on all effects.<br><b>Requests:</b> Allow the submission point in part, amending the expression 'effects' to read 'adverse effects' and, in (a) amending the wording to 'avoiding significant adverse effects'. Alternatively, such further or other relief as will achieve the same outcome. |
| <b>Policy P4</b> | <i>Minimising adverse effects</i> | <b>NZTA S146/076</b>                             | Requests amendments including consideration of the operational requirements and functional needs of regionally significant infrastructure (and other improvements to wording)   | <b>Support:</b> Consideration of operational requirements and functional needs for regionally significant infrastructure should be explicit in the policy framework.  |

| Reference         | Policy or Provision   | Submitter Name & Submission Reference                    | Submitter's Submission Points  | MEL Position, Reasons and Requested Decision:  |
|-------------------|---|--|--|--|
|                   |   |  |  | <b>Requests:</b> Allow the submission point or further or other relief as will achieve the same outcome.   |
| <b>Policy P4</b>  | <i>Minimising adverse effects</i>   | <b>Ravensdown S310/023</b>                               | Requests amendments including consideration of the operational requirements and functional needs of regionally significant infrastructure  | <b>Support:</b> Consideration of operational requirements and functional needs for regionally significant infrastructure should be explicit in the policy framework.<br><b>Requests:</b> Allow the submission point or further or other relief as will achieve the same outcome.   |
| <b>Policy P9</b>  | <i>Public access to and along the c.m.a. and the beds of lakes and rivers</i> | <b>Chorus NZ Ltd S144/010</b><br><b>Spark NZ S98/010</b> | Except where it is necessary to:...<br>(d) <u>Protect Regionally Significant Infrastructure</u>  | <b>Support:</b> The request is appropriate and consistent with the RPS approach.<br><b>Requests:</b> Allow the submission point or further or other relief as will achieve the same outcome.   |
| <b>Policy P12</b> | <i>Benefits of regionally significant infrastructure</i>                      | <b>Rangitane o Wairarapa S279/079</b>                    | Amend to clarify that the operation, use, maintenance and upgrade can still have adverse effects that need to be managed; and add a new policy to ensure that new or increases in scale or extent of existing regionally significant infrastructure and REG shall avoid adverse effects on sites in Schedules A to F, H and J. | <b>Support and oppose:</b> It is acknowledged that adverse effects need to be managed. However, the single approach of <i>avoidance</i> only of all effects on sites within the named Schedules is not consistent with the framework of the RMA.<br><b>Requests:</b> Allow the submission point in part but disallow the requested amendments that would require avoidance of all adverse effects. |
| <b>Policy P13</b> | <i>Regionally significant infrastructure</i>                                  | <b>Rangitane o Wairarapa S279/080</b>                    | Amend to clarify that the operation, use, maintenance and upgrade can still have adverse effects that need to be managed; and add a new policy   | <b>Support and oppose:</b> It is acknowledged that adverse effects need to be managed. However, the single approach of <i>avoidance</i> only of all effects on sites within the named  |

| Reference            | Policy or Provision                          | Submitter Name & Submission Reference                     | Submitter's Submission Points  | MEL Position, Reasons and Requested Decision:  |
|----------------------|--|---|--|--|
|                      |  |   | to ensure that new or increases in scale or extent of existing regionally significant infrastructure and REG shall avoid adverse effects on sites in Schedules A to F, H and J.  | Schedules is not consistent with the framework of the RMA.<br><b>Requests:</b> Allow the submission point in part but disallow the requested amendments that would require avoidance of all adverse effects.   |
| Policy P13           | <i>Regionally significant infrastructure</i> | NZTA S146/083<br>Vector Gas S145/029<br><br>NZTA S146/083 | Amend to include use, operation, maintenance, upgrade <u>and development</u> of regionally significant infrastructure.<br><br>Also add: <i>'The development of new regionally significant infrastructure and renewable energy generation activities to meet the needs of the community are beneficial and are generally appropriate.'</i>  | <b>Support in part:</b> MEL agrees that the development of new, as well as the operation/maintenance/upgrading of regionally significant infrastructure should be provided subject to avoiding, remedying or mitigating adverse effects.<br><b>Requests:</b> Allow the submission point or such further or other relief as will achieve the same outcome, acknowledging the need to avoid, remedy or mitigate adverse effects. |
| Requested New Policy |  | Transpower NZ S165/010                                    | Policy 13A: <u>'Managing environmental effects of new National Grid infrastructure.</u><br><u>When considering the environmental effects of new infrastructure associated with the National Grid, or major upgrades of the existing National Grid, decision makers shall have regard to:</u><br>(a) <u>The benefits of the infrastructure to meet the needs of present and future generations.</u><br>(b) <u>The extent to which any adverse environmental effects have been</u> | <b>Support:</b> The proposed matters for consideration are generally appropriate for regionally significant infrastructure.<br><b>Requests:</b> Allow the submission point or such further or other relief as will achieve the same outcome.   |

| Reference         | Policy or Provision   | Submitter Name & Submission Reference        | Submitter's Submission Points  | MEL Position, Reasons and Requested Decision:  |
|-------------------|---|--|--|--|
|                   |   |  | <u>avoided, remedied or mitigated by the route, site and method selection; and the constraints imposed by the technical and operational requirements of the National Grid.</u>   |  |
| <b>Policy P14</b> | <i>Activities incompatible with regionally significant infrastructure</i> | <b>Rangitane o Wairarapa S279/081</b>        | Amend to clarify that the operation, use, maintenance and upgrade can still have adverse effects that need to be managed; and add a new policy to ensure that new or increases in scale or extent of existing regionally significant infrastructure and REG shall avoid adverse effects on sites in Schedules A to F, H and J.   | <b>Support and oppose:</b> It is acknowledged that adverse effects need to be managed. However, the single approach of <i>avoidance</i> only of all effects on sites within the named Schedules is not consistent with the framework of the RMA.<br><b>Requests:</b> Allow the submission point in part but disallow the requested amendments that would require avoidance of all adverse effects. |
| <b>Policy P25</b> | <i>Natural Character</i>  | <b>NZTA S146/090<br/>Vector Gas S145/033</b> | Amend: <del>'Use and development shall avoid, remedy or mitigate significant adverse effects on natural character in the coastal marine area....and in the beds of lakes and rivers, and avoid remedy or mitigate other adverse effects of activities taking into account...</del><br>(c) <del>Whether it is practicable to protect natural character from inappropriate use and development through the use and development is appropriate after considering:</del><br>(i) <del>Using an the use of alternative locations, or</del> | <b>Support in part:</b> The proposed approach is broadly appropriate for regionally significant infrastructure and for renewable energy generation activities.<br><b>Requests:</b> Allow the submission point and add to part (iv) ' <u>and renewable energy generation</u> ' along with regionally significant infrastructure.  |

| Reference  | Policy or Provision | Submitter Name & Submission Reference | Submitter's Submission Points  | MEL Position, Reasons and Requested Decision:   |
|------------|---------------------|---------------------------------------|--|---|
|            |                     |                                       | <p>form of development that would be more appropriate to that location; and</p> <p>(ii) <del>Considering</del> the extent to which functional need or existing use limits location and development options; and</p> <p>(iii) <del>Considering</del> the extent to which functional need or existing use limits location and development options; and</p> <p>(iv) <u>Whether the use and development is regionally significant infrastructure</u></p> |   |
| Policy P25 | Natural character   | Minister of Conservation S75/058      | Amend: '(d) <del>whether it is practicable the ability to protect natural character from inappropriate use and development through:</del>  | <p><b>Oppose in part:</b> The RMA requires protection from inappropriate use and development – not absolute protection in all situations.</p> <p><b>Requests:</b> Retain the reference to protection of natural character 'from inappropriate use and development'.</p> |
| Policy P25 | Natural character   | Rangitane o Wairarapa S279/090        | Amend: <u>Use and development shall must be managed to avoid significant adverse effects on natural character</u> .....  | <p><b>Oppose in part:</b> The proposed amendments are at odds with the 'cascade' approach to managing effects that is adopted in the PNRP.</p>  |

| Reference  | Policy or Provision      | Submitter Name & Submission Reference  | Submitter's Submission Points  | MEL Position, Reasons and Requested Decision:  |
|------------|--------------------------|--|--|--|
|            |                          |  | <del>(d) Whether it is practicable to protect natural character from inappropriate use and development through<br/>(i) Using an alternative location, or form of development that would be more appropriate to that location, and<br/>Considering the extent to which functional need or existing use limits location and development options.</del> | <b>Requests:</b> Disallow the submission point and adopt the cascade approach of avoiding, remedying or mitigating adverse effects and retain the matters for consideration detailed in Policy P25 or such further or other relief as will achieve the same outcome.   |
| Policy P33 | Indigenous fish habitats | NZTA S146/096  | Amend: '....avoided <u>where practicable</u> .'  | <b>Support in part:</b> The submission addresses the same point as Meridian's own submission but requests a different solution.<br><b>Requests:</b> Allow the submission point in addition to or as an amendment to the relief requested in MEL's original submission. |
| Policy P33 | Indigenous fish habitats | Roading, Parks and Gardens HCC, UHCC S85/035<br>Fertiliser Association NZ S302/038 | Revise the language to focus on protection from <i>significant</i> adverse effects and not 'more than minor' effects   | <b>Support in part:</b> The submission addresses the same point as Meridian's own submission but requests a different solution.<br><b>Requests:</b> Allow the submission point in addition to or as an amendment to the relief requested in MEL's original submission. |
| Policy P33 | Indigenous fish habitats | Minister of Conservation S75/066   | Amend (b) and (c) to ensure that the policy requires avoidance of more than minor adverse effects.   | <b>Oppose:</b> The requested amendment sets a very high threshold that is not consistent with the RMA approach. The RMA does not require avoidance of all effects that are <i>more than minor</i> .  |

| Reference                                | Policy or Provision                                | Submitter Name & Submission Reference   | Submitter's Submission Points  | MEL Position, Reasons and Requested Decision:   |
|--|--|---|--|---|
|  |  |   |  | <b>Requests:</b> Disallow the submission point.   |
| <b>4.6 Sites with significant values</b> |  | <b>RFBPS S353/003</b>   | Include more specific provisions that include significant sites in the wider coastal environment and not just the c.m.a. | <b>Oppose:</b> The request is beyond GWRC's jurisdiction (which is limited to activities within the coastal marine area).<br><b>Requests:</b> Disallow the submission point.  |
| <b>Policy P44</b>                        | <i>Mana whenua values</i>                          | <b>CentrePort S121/060<br/>NZTA S146/106<br/>KiwiRail Holdings<br/>S140/043</b> | Amend to say ' <u>protected from inappropriate use and development</u> '   | <b>Support:</b> The proposed wording addresses a similar point made in MEL's original submission and has merit.<br><b>Requests:</b> Allow the submission point in addition to or as an amendment to the relief requested in MEL's original submission.  |
| <b>Policy P138</b>                       | <i>Structures in sites with significant values</i> | <b>Rangitane o Wairarapa<br/>S279/160</b>                                       | Amend to require any adverse effects on the sites to be avoided  | <b>Oppose:</b> The request defeats the intention of the Policy. There are other policies that more appropriately address the avoidance, remediation or mitigation of adverse effects. Also the focus should be on significant adverse effects and not all effects.<br><b>Requests:</b> Disallow the submission point. |

| Reference                            | Policy or Provision                   | Submitter Name & Submission Reference   | Submitter's Submission Points   | MEL Position, Reasons and Requested Decision:   |
|--------------------------------------|---------------------------------------|---|---|---|
| <b>RULES</b>                         |                                       |   |   |   |
| <b>Rule R42 permitted discharges</b> | <i>New requested rule</i>             | <b>Wellington Water S135/138</b>  | Provide a special category of permitted activity for regionally significant infrastructure or have consents trigger to controlled activity  | <b>Support:</b> The requested amendment is similar to MEL's own submission on Rule R53.<br><b>Requests:</b> Allow the submission point and amend the rule framework in a manner that is consistent with MEL's own submissions on Rule R53 or such further or other relief as will achieve the same outcome. |
| <b>Rule R42</b>                      | <i>Minor discharges</i>               | <b>Rangitane o Wairarapa S279/165</b>   | Include SS standard for Schedule B, C F1b, F1c, F2a, F2b, F2c, F5 and H sites and amend 'zone of reasonable mixing' to ensure it does not extend into sites of significance identified in Schedules C and H | <b>Oppose in part:</b> It may not always be practicable to confine the zone of reasonable mixing in the manner requested and the request expands the scope of the SS standard in a manner that is potentially inappropriate.<br><b>Requests:</b> Disallow the submission point.                             |
| <b>Rule R48</b>                      | <i>Permitted stormwater discharge</i> | <b>Mahaki Holdings S370/062 and the identical submissions of others (please note this further submission point applies also to the identical submission points made by multiple others)</b> | Delete R48  | <b>Oppose:</b> R48 is important in permitting discharge of stormwater to water from individual properties (including from regionally significant infrastructure sites).<br><b>Requests:</b> Disallow the submission point.  |