

Submission by Vector Limited

**Proposed Natural Resources Plan for the Wellington
Region**

25 September 2015

Submission on the Proposed Natural Resources Plan for the Wellington Region under Clause 6 of Schedule 1, Resource Management Act 1991

To Greater Wellington Regional Council (Council)
Name of submitter: Vector Gas Limited (Vector)

Vector is making this submission in accordance with Clause 6 of Schedule 1, Resource Management Act 1991.

Vector:

- could not gain an advantage in trade competition through this submission;
- wishes to be heard in support of its submission; and
- would be prepared to consider presenting a joint case at any hearing if others make a similar submission.

The specific details of Vector's submission, and decisions sought in relation to the provisions contained in the chapters above, are contained in the attached table.

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Signature of the person authorised to sign on behalf of Vector Limited

Date: 25 September 2015

1 Introduction to Vector

Vector Gas Limited ("Vector") is the owner and operator of approximately 2500km of high pressure natural gas transmission pipelines throughout the North Island.

The below ground gas transmission pipelines deliver gas from production stations in Taranaki through to various towns and locations throughout the North Island. The gas transmission system delivers gas to distribution networks via 'Delivery Points'. Delivery Points are above ground pressure regulating station sites which transition between gas in the high pressure system to the medium to low pressure distribution pipeline network.

Within the Wellington region Vector owns and operates approximately 126km of high pressure gas transmission pipeline and 10 Delivery Points. A location plan of the gas transmission system is attached.

2 Typical Vector operations and activities

The section below provides a summary of the operations and activities undertaken by Vector which are likely to require statutory approvals under the NRP. Further detail or explanations as to the nature and scale of these operations and activities can be supplied on request.

2.1 Maintenance, replacement, upgrade, removal and development

Activities and operations related to maintaining, replacing, upgrading, removal or developing the Vector network typically involve those identified in the table below:

Activity	Description
Land Use Activities	
Open trenching / earthworks	To access the existing pipe or in preparation for a replacement or new pipe to be laid (and back-filling / compaction upon completion of the works).
Horizontal Directional Drilling	A trenchless construction method used to install pipelines where conventional construction (open trenching) are not feasible or practicable, or will potentially cause unacceptable adverse effects in Vector's opinion.
Earthworks and vegetation clearance	To enable and provide access to Vector's assets through Roothing and tracking activities and also potentially to establish construction yards.
Reinstatement	Reinstatement of disturbed soil and vegetation post construction works.
Discharges to Air	
Gas venting	Associated with tie-in works ¹ whereby pressure in the pipeline is reduced and delivery staging venting. Natural gas itself is odourless therefore an odorant is added to the gas to enable detection for purging purposes.
Discharges to land and water	
Drilling fluid	This typically comprises water and bentonite, a naturally occurring and environmentally safe clay mineral containing no polymer additives or chemical treatments. Fluid is largely re-used in drilling operations but some residual

¹ Connecting new / replacement and existing pipe sections

	(minimal) fluid recovered at the end of the project is often dispersed onto land
Dewatering of trenches	In areas with a high water table (e.g. the Kapiti Coast), de-watering of open trenches is required to enable pipe works and for health and safety reasons.
Hydro-testing	Hydro-testing are often required when commissioning new pipelines which require a discharge of water to receiving environments.
Works in waterbodies	
Pipe(s) traversing or running parallel to the beds of waterways	The gas pipeline traverses and runs parallel to many waterbodies, including wetlands. Works in, over and under the beds of waterways is often required.

2.2 Protection from third party works

The high pressure gas transmission pipelines are required to meet the safety and operational requirements of the Health and Safety in Employment (Pipelines) Regulations 1999 and the operating code Standard AS2885 Pipelines – Gas and Liquid Petroleum (AS2885). Vector is required to ensure the protection and integrity of the pipeline is maintained to ensure the safety of the public, property, and the environment.

Third party interference is one of the main risks to the safety and integrity of the underground pipelines. Activities which may affect the gas pipelines should take into account the location and protection requirements of the pipelines. Activities in the vicinity of gas transmission pipeline should be carried out, as far as practicable, in such a way so as not to compromise the safe and efficient operation of the pipeline.

3 Wellington Regional Policy Statement

The Wellington Regional Policy Statement (RPS) was made operative in 2010. 'Regionally significant infrastructure' is defined in the RPS as including:

"pipelines for the distribution or transmission of natural or manufactured gas or petroleum".

Key provisions in the RPS as they relate to enabling and protecting Vector's regionally significant assets, operations and activities are:

RPS Provision	Policy and Objective Wording
Objective 10:	The social, economic, cultural and environmental, benefits of regionally significant infrastructure are recognised and protected.
<i>Policies to achieve the objective through the regional (and district) plan</i>	
Policy 7:	Recognising the benefits from renewable energy and regionally significant infrastructure – regional and district plans
Policy 8:	Protecting regionally significant infrastructure – regional and district plans
<i>Policy to achieve the objective through the consideration in statutory approval processes</i>	
Policy 39:	Recognising the benefits from renewable energy and regionally significant infrastructure – consideration

These provisions need to be 'given effect to' in the Natural Resources Plan. In the context of the PNRP this essentially means ensuring that:

- the Vector network is able to be safely, effectively and efficiently operated, maintained, upgraded and developed; and,
- the adverse effects of development or activities in proximity to the Vector network are managed to the extent that adverse effects on the network are reduced, minimised or avoided.

4 General Submission

Without limiting the generality of this general submission, Vector seeks decisions as sought in the attached Schedule One, and any consequential relief required to achieve the relief sought.

Schedule One details the specific provisions that Vector is supportive of and / or opposes, and also outlines relief sought by Vector to address concerns with the Proposed Natural Resources Plan as currently drafted.

In summary, Vector's submission generally seeks that:

- The PNRP continues to recognise that the gas transmission system is regionally significant infrastructure;
- The gas transmission system is enabled to be safely, effectively and efficiently operated, maintained, upgraded and developed (i.e. recognised and provided for), including through an enabling activity status where there is a need for resource consent (i.e. discretionary activity status as opposed to non-complying);
- The gas transmission system is recognised as having functional and operational requirements and constraints, including in respect of its location;
- There may be some occasions where works undertaken by Vector may generate adverse environmental effects, and therefore inclusion of the term 'avoid' in the policy framework needs to be used appropriately;
- That the adverse effects of third party development or activities in close proximity to the gas transmission system are managed to the extent that adverse effects on the network are reduced or avoided;
- That the assessment of applications for works and activities involving the gas transmission system (as regionally significant infrastructure) consider the Best Practicable Option; and
- That where third party activities are proposed in close proximity to the gas transmission system, that Vector is explicitly identified as an affected party.

Schedule One: Detailed Submission by Vector Ltd

Plan Provision	Support/Oppose/ Amend	Submission/Reasons	Relief / Decision Sought
Chapter 1: Introduction			
1.1 Introduction	Amend	Vector is supportive of the approach being taken in respect of working in partnership with iwi and hapu. Vector considers an illustration as to the general rohe of the respective iwi and hapu would be beneficial, especially to inform pre-application consultation efforts for location based projects.	<ul style="list-style-type: none"> ■ Include a diagram illustrating the general rohe of Iwi and hapu within the region.
1.4 Whaitua committees	Neutral	<p>Vector notes that integrated management is to be facilitated by the 5 whaitua committees. The committees will each develop an implementation programme which will include both regulatory provisions and non-regulatory programmes. The regulatory provisions will be included progressively by way of plan changes or variations in the whaitua-specific chapters of the Plan. While generally supportive of this concept, Vector has the following concerns with this approach:</p> <ul style="list-style-type: none"> • there is a lack of industry representation; • there is a need for consistent region-wide provisions for linear infrastructure. 	<ul style="list-style-type: none"> ■ Provide a mechanism for industry representation, including infrastructure providers, to be involved in the whaitua committees, especially in the context of regulatory mechanisms e.g. the development / progression of plan changes.
Chapter 2: Interpretation			
2.1.3 Rule	Support	The PNRP has, where practicable, combined associated activities into one rule. This means that several permissions which may be required under section 9 and sections 12 to 15B of the RMA are included in one rule for which one application for resource consent can be made. This simplified approach greatly assists plan users to identify both rule triggers and their understanding of the rule framework applying to their proposed activities.	<ul style="list-style-type: none"> ■ Retain the approach of including suites of s9, 12 – 15 activities under a single rule.
2.2 Definitions			

Best Practicable Option		Vector seeks the inclusion of the term best practicable option which is an important process to determine acceptable use and development in an infrastructure context. The term is sought for inclusion throughout the policy framework.	<ul style="list-style-type: none"> ■ Add a new definition: <i>Best practicable option, means the best site, route or method for preventing or minimising the adverse effects on the environment having regard, among other things, to:</i> <ul style="list-style-type: none"> (a) <i>the nature of the discharge or emission and the sensitivity of the receiving environment to adverse effects; and</i> (b) <i>the financial implications, and the effects on the environment, of that option when compared with other options; and</i> (c) <i>the current state of technical knowledge and the likelihood that the option can be successfully applied.</i>
Bore	Support with amendment	Vector supports the definition of 'bore' but believes for clarity, a note should be included under the definition confirm that 'geotechnical investigation bore' has its own definition.	<ul style="list-style-type: none"> ■ Amend the definition: A structure or hole in the ground constructed for the purpose of: <ul style="list-style-type: none"> (a) investigating or monitoring the conditions below the ground surface, or (b) abstracting liquid substances from the ground, or (c) discharging liquid substances into the ground. <p><i>Note: a separate definition of 'geotechnical investigation bore' is also contained in the Plan.</i></p>
Dewatering	Support with amendment	Vector supports the definition subject to a minor amendment to reflect that dewatering can also occur through the diversion of groundwater.	<ul style="list-style-type: none"> ■ Amend the definition of dewatering The abstraction <i>or diversion</i> of groundwater so as to lower the water table for the period of time required to enable maintenance, excavation, construction, or geotechnical work to proceed in the dewatered area, or to sustain a lower localised water table.
Earthworks	Support with amendment	Vector supports the definition, subject to confirmation that bore related activities do not constitute earthworks. Bores, including geotechnical bores, have their own definition and rule framework and therefore clarity that these activities are not 'earthworks' will avoid confusion as to the need for consents / applicability of the rules.	<ul style="list-style-type: none"> ■ Amend the definition: The disturbance of a land surface from the time soil is first disturbed on a site until the time the site is stabilised. Earthworks includes blading, contouring, ripping, moving, removing, placing or replacing soil or earth, by excavation, or by cutting or filling operations, or by root raking. Earthworks do not include: <ul style="list-style-type: none"> (a)

			<p>(c) thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and</p> <p>(i) <u>The construction, repair or maintenance of a bore or geotechnical investigation bore.</u></p>
Functional need	Support with amendment	Vector supports the definition of functional need as it relates to the CMA, rivers and lakes but notes that this constraint is not necessarily limited to these locations. Linear infrastructure is often functionally constrained.	<ul style="list-style-type: none"> Amend the definition: When an activity is dependent on having its location, <u>including</u> in the coastal marine area or in the beds of lakes and rivers.
Geotechnical investigation bore	Support	Vector supports the definition.	<ul style="list-style-type: none"> Retain the definition Any bore constructed to provide information about soil, sediment or rock.
Good management practice	Support	Vector supports the definition. Technology, knowledge and methods change over time and the statutory documents should recognise (and provide) this.	<ul style="list-style-type: none"> Retain the definition: Practices, procedures or tools (including rules) that are effective at achieving the desired performance while providing for desired environmental outcomes. Good management practice evolves through time and results in continuous improvement as new information, technology and awareness of particular issues are developed and disseminated. Good management practice guidelines can be found on the Wellington Regional Council's website http://www.gw.govt.nz/good-management-practice/
Operational requirement	Support with amendment	Vector supports the definition of operational requirement. Linear infrastructure often has operational requirements in order to function efficiently and effectively.	<ul style="list-style-type: none"> Amend the definition of operational requirement: 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.
Regionally significant infrastructure	Support with amendment	Vector notes that only 'pipelines' are included within the definition whereas other infrastructure, such as Delivery Points for example, are integral to, and form part of, the network.	<ul style="list-style-type: none"> Amend the definition of 'regionally significant infrastructure': Regionally significant infrastructure includes: <ul style="list-style-type: none"> Pipelines <u>and incidental equipment and facilities</u> for the distribution or transmission of natural or manufactured gas or petroleum.
Residual adverse effects	Support	Vector supports the definition of the term and its inclusion in the Plan to the extent that it recognises that not all effects can be avoided,	<ul style="list-style-type: none"> Retain the definition of residual adverse effects:

		remedied or mitigated. There may be functional and operational requirements which result in residual adverse effects remaining.	The negative effects on the environment remaining from an activity after avoidance, remediation, and mitigation measures have been taken.
Chapter 3: Objectives			
Beneficial Use and Development Objective O12	Support with amendment	The PNRP identifies two infrastructure related issues of significance: <ol style="list-style-type: none"> 1. infrastructure enables communities to provide for their social, economic and cultural wellbeing; and, 2. the management, use and operation of infrastructure can be adversely affected when incompatible land uses occur under, over or adjacent. 	<ul style="list-style-type: none"> ■ Amend Objective O12: The social, economic, cultural and environmental benefits of regionally significant infrastructure and renewable energy generation activities are recognised <u>within the region and beyond</u>.
Beneficial Use and Development New Objective O13	Support with amendment	RPS Policies 7 and 8 seek to address these issues, and ultimately achieve Objective 10 (of the RPS). The PNRP needs to 'give effect' to these provisions. Repeating them is not considered sufficient as the NRP provisions need to implement the RPS framework Furthermore, the benefits of linear infrastructure can extend across regional boundaries, and should where possible be considered as a coherent whole, rather than being assessed on a piecemeal basis.	<ul style="list-style-type: none"> ■ Amend Objective O13: The use and ongoing operation of regionally significant infrastructure and renewable energy generation activities in the coastal marine area are protected from new incompatible use and development occurring under, over, or adjacent to the infrastructure or activity.
Beneficial Use and Development New Objective		For this reason:	<ul style="list-style-type: none"> ■ Add new objective: <u>The safe, effective and efficient use, operation, maintenance, upgrade and development of regionally significant infrastructure is provided for</u>
Beneficial Use and Development New Objective		<ul style="list-style-type: none"> • an enabling objective is sought to provide for the ongoing use, operation, maintenance, upgrade and development of regionally significant infrastructure; and • an objective is sought to recognise that some regionally significant infrastructure has functional, operational and locational constraints. <p>In addition, an amendment is sought to Objective 13 to reflect the fact that reverse sensitivity type effects are not exclusive to infrastructure which is located in the coastal marine area.</p>	<ul style="list-style-type: none"> ■ Add new Objective: <u>To recognise that regionally significant infrastructure represents appropriate use and development in all environments where there are functional needs and / or operational requirements</u>
Natural Character Form and Function:	Support with amendment	Vector notes that the current wording of Objective 18 implies that all such environments are degraded and this is unlikely to be the case.	<ul style="list-style-type: none"> ■ Amend Objective O18: The ecological, recreational, mana whenua, and amenity values of

Objective 18			estuaries including their sensitivity as low energy receiving environments are recognised, and their health and function is restored over time, <i>where degraded</i> .
Natural Character Form and Function: Objective 19	Oppose	Vector considers the objective is not consistent with effects based planning. Interference, such as dewatering for example, may be deemed to be interfering with natural processes, but it could be environmentally acceptable from an effects perspective.	<ul style="list-style-type: none"> Delete Objective O19: The interference from use and development on natural processes is minimised.
Natural Character, Form and Function Objective 20	Support	Vector supports the object which recognises that not all risks associated with natural hazards can be avoided, but rather the focus on is the acceptability of the effects and residual risks. Risk can be mitigated by design.	<ul style="list-style-type: none"> Retain Objective 20: The risk, residual risk, and adverse effects from natural hazards and climate change on people, the community and infrastructure are acceptable.
Natural Character Form and Function: Objective 21	Provisionally support	Vector notes the intent of the objective and that it would apply in the coastal marine area and the beds of lakes and rivers which as defined as high hazard areas. Vector seeks assurance that use and development associated with regionally significant infrastructure, and which often has functional and operational constraints and requirements, is appropriate.	<ul style="list-style-type: none"> Retain Objective O21, subject to provisions which confirm that regionally significant infrastructure is appropriate as sought elsewhere in this submission:
Natural Character Form and Function: Objective 22	Oppose	Vector may seek to use hard engineering solutions to protect its assets in the longer term. Using hard engineering solutions may result in less environmental effects rather than doing repeat minor works or constructing ineffective solutions. While there is a requirement to assess alternatives in some instances under the RMA, there is no mandatory requirement to do this in all instances.	<ul style="list-style-type: none"> Delete Objective 22: Hard engineering mitigation and protection methods are only used as a last practicable option.
Sites with significant values Objective 31	Support with amendment	Vector considers it critical to recognise that some infrastructure has functional needs and operational requirements. Vector therefore considers it appropriate and necessary to embed an enabling focus to the object.	<ul style="list-style-type: none"> Amend Objective O31: Outstanding water bodies and their significant values are protected <i>from inappropriate use and development</i> .
Sites with Significant values: Objective 35	Support with amendment	Vector considers it appropriate and necessary to embed an enabling focus to the objective and also notes that the current wording of Objective 35 implies that all such environments are degraded and this is	<ul style="list-style-type: none"> Amend Objective O35: Ecosystems and habitats with significant indigenous biodiversity

		unlikely to be the case.	values are protected <i>from inappropriate use and development</i> and restored, <i>where degraded</i> .
Soil: Objective 43	Support with amendment	Vector considers that the effects of human health should be managed and regulated by the district / city councils under the National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health, not the regional council. The regional council holds the Selected Land Use Register and therefore the identification of such land should be recognised, as well as the management of activities on contaminated land, such as discharges from such land, which may cause adverse environmental effects.	<ul style="list-style-type: none"> Amend Objective O43 Contaminated land is <i>identified and</i> managed to protect human health and the environment <i>from contamination related effects</i>
Chapter 4: Policies			
Ki uta ki tai and integrated catchment management: Policy 4	Oppose	Vector is concerned with the need to reduce adverse effects of an activity to the 'smallest amount practicable'. Fundamentally, this is not the intent of the RMA. Vector believes that this policy should be re-focused to achieve the best practicable option / balance when considering environmental, social, cultural and economic factors.	<ul style="list-style-type: none"> Amend the policy to focus on achieving the best practicable option, rather than minimising effects to the smallest amount practicable.
Ki uta ki tai and integrated catchment management: Policy 5	Oppose	Vector seeks that this review of existing consents policy be deleted. Firstly it is set in statute and secondly it is more appropriate for inclusion at the resource consent application stage.	<ul style="list-style-type: none"> Delete Policy 5 The conditions of existing resource consents to discharge contaminants to fresh water or coastal water, and to take and use water, may be reviewed pursuant to section 128 of the Resource Management Act 1991 in respect of future changes to the Plan.
Duration of consents: new policy		Vector seeks the inclusion of a new policy directing the duration of consents for regionally significant infrastructure. Generally speaking, and to provide certainty for projects, it is Vector's expectation that long term consents would be granted for such infrastructure.	<ul style="list-style-type: none"> Add a new policy to provide direction on the duration of operational consents for infrastructure of regional significance. <i>Resource consent durations for regionally significant infrastructure applications required under ss13, 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.</i>
Beneficial use and development	Support with amendment	Vector supports the intent of the Policy but seeks amendments to better reflect its activities, operations and activities, and specifically:	<ul style="list-style-type: none"> Amend Policy 12:

Policy 12		<ul style="list-style-type: none"> • provide an enabling context in addition to only recognising the benefits of the infrastructure. It remains unclear what only 'recognising' would entail; • acknowledge the investment value of infrastructure in light of the requirements of Section 104(2A) of the RMA; and • recognise the fact that some linear regionally significant infrastructure, such as the gas transmission system, is located over, under, within and adjacent to the beds of lakes and rivers. 	<p>The benefits of regionally significant infrastructure and renewable energy generation activities are recognised <u>and provided for</u> by having regard to <u>taking into account</u>:</p> <ul style="list-style-type: none"> (a) . . . (b) the <u>investment in, and the</u> location of existing infrastructure and structures, and (c) (d) the functional need for port activities <u>and other regionally significant infrastructure</u> to be located within the coastal marine area <u>and the coastal area</u>, and (e) <u>the functional need for regionally significant infrastructure to be located over, under, within and adjacent the beds of rivers and lakes , and</u> (f) operational requirements associated with developing, operating, maintaining and upgrading regionally significant infrastructure and renewable energy generation activities.
Beneficial use and development Policy 13	Support with amendment	Vector supports the intent of the Policy but notes that replacement and development of such infrastructure is absent. It is also unclear why the policy only relates to existing infrastructure as it should apply to existing and new.	<ul style="list-style-type: none"> ■ Amend Policy 13: <p>The use, operation, maintenance, and upgrade <u>replacement, and development</u> of existing regionally significant infrastructure and renewable energy generation activities are beneficial and generally appropriate.</p>
Beneficial use and development Policy 14	Support with amendment	Vector supports the intent of the Policy but seeks amendments to better protect its activities, operations and assets. It is noted the policy applies an 'avoid, remedy or mitigate' approach as opposed to only avoid and this approach is acceptable to Vector and seeks it be applied elsewhere in the PNRP.	<ul style="list-style-type: none"> ■ Amend Policy 14: <p>Regionally significant infrastructure and renewable energy generation activities shall be protected from new incompatible use and development occurring under, over or adjacent to it, by locating and designing any new use and development to avoid, remedy or mitigate any reverse sensitivity effects <u>which may compromise the efficient and effective use, maintenance, upgrading replacement or development of</u></p>

			<u>that infrastructure.</u>
Maori Values Policy 19	Support with amendment	Vector supports the intent of the policy but has concerns that it fails adopt an effects based approach. The policy introduces what is in-effect an ongoing focus to minimise effects, whereas the reality for infrastructure projects is often reaching a balanced, yet acceptable, level of effects between different values.	<ul style="list-style-type: none"> ■ Amend Policy P19: The cultural relationship of Māori with air, land and water shall be recognised and the adverse effects on this relationship and their values shall be <u>avoided, remedied or mitigated</u> minimised.
Maori Values Policy 21	Support with amendment	In a resource consent application process context, Vector notes the statutory acknowledgement would be had regard to and summaries of applications would be forwarded to trustees / members to provide the opportunity to provide comment. This is supported by Vector, especially in the context of Section 6(e) and 8 of the RMA. From an applicant perspective, it would be beneficial if a plan of the statutory acknowledgement areas was included in Schedule D. This would enable applicants to easily identify such areas assist in the identification of stakeholders / interested parties early on in project scoping exercises.	<ul style="list-style-type: none"> ■ Include a plan in Schedule D illustrating the statutory acknowledgement areas as well as contact details for iwi and hapu where appropriate.
Natural form and function Policy 25	Support with amendment	Vector is generally supportive of the policy in that overall, it seeks to avoid, remedy or mitigate adverse effects on natural character in the coastal marine area and the beds of lakes and rivers. Vector is of the opinion that the policy can be simplified, as well as apply an effects-based approach, as opposed to the bottom-line approach. Vector generally supports the intent of Policy 25(d), but considers its focus should be amended to better reflect the RMA and also acknowledge that some development and use is appropriate e.g. infrastructure of regional importance.	<ul style="list-style-type: none"> ■ Amend Policy 25: Use and development shall avoid, remedy or mitigate significant adverse effects on natural character in the coastal marine area (including high 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: <ul style="list-style-type: none"> (d) whether it is practicable to protect natural character from inappropriate use and development through <u>the use and development is appropriate after considering:</u> <ul style="list-style-type: none"> (i) using an <u>the use of</u> alternative locations, or form of development that would be more appropriate to that location; and (ii) considering the extent to which functional need or existing use limits location and development options.

			(iii) <u>Whether the use and development is regionally significant infrastructure</u>
Natural form and function Policy 26	Support with amendment	Vector considers the policy is not consistent with effects based planning. Development may interfere with natural processes, but it could be acceptable from an effects perspective.	<ul style="list-style-type: none"> ■ Amend Policy 26: Use and development will be managed to minimise <u>avoid, remedy or mitigate</u> effects on the integrity and functioning of natural processes.
Natural form and function Policy 27	Support with amendment	Vector generally supports the policy subject to a number of amendments.	<ul style="list-style-type: none"> ■ Amend Policy 27: Use and development, including hazard mitigation methods, in high hazard areas shall be avoided except where: <ul style="list-style-type: none"> (a) They have a functional need or operational requirement or there is no practicable alternative to be so located, and (b) the risk to the development and/or residual risk after hazard mitigation measures, assessed using a risk-based approach, is low, and (c) the development does not cause or exacerbate natural hazards in other areas <u>to an unacceptable degree</u>; and (d) interference with natural processes (coastal, fluvial and lacustrine processes) is minimised, and (e) . . .
Natural form and function Policy 28	Oppose	Vector opposes the policy (as well as the object (22) which the policy is seeking to achieve). Hazard mitigation measures must be fit for purposes and a presumption to avoid hard engineering solutions is not appropriate. From a cost perspective, hard solutions are typically more expensive and so soft options would be investigated where such design is fit for purpose in the local setting. Ultimately, It is the effects of those solutions which should form the basis of the policy intent. The policy should also contemplate new development, as well as existing development.	<ul style="list-style-type: none"> ■ Replace Policy 28: <u>Avoid, remedy or mitigate the environmental effects of natural hazards, ensuring that mitigation and protection methods reduce risk to existing and new development using the risk based approach.</u>
Biodiversity, aquatic ecosystem health and mahinga	Support with amendment	Vector supports the intent of the policy but considers parts of it can be deleted as it relates more to the objective which is trying to be achieved, as opposed what a policy should address i.e. how the objective will be	<ul style="list-style-type: none"> ■ Amend Policy 31: Aquatic ecosystem health and mahinga kai shall be maintained or

kai Policy 31		<p>achieved.</p> <p>While generally supportive of what it is trying to achieve, Vector questions the need for this policy as it describes specific measures and activities that should be minimised and avoided, whereas the intent of the policy should be managing effects – as Policy 32 does, albeit in the context of significant effects. Vector’s concern is that it may not always be possible to minimise or avoid effects, especially where there are functional needs and operational requirements as is often the case with regionally significant infrastructure. This being the case, Vector believes that the terms ‘minimise’ and ‘avoid’ should be replaced with ‘avoid’, ‘remedy’ or ‘mitigate’, or alternatively provide a further sub-clause which recognises there may be functional and operational requirements associated with the use and development of resources.</p>	<p>restored by m<u>Managing</u> the effects of use and development on physical, chemical and biological processes to <u>avoid, remedy or mitigate</u>:</p> <p>. . . .</p> <p>[delete terms minimise and avoid in sub-policies]</p> <p>Or</p> <ul style="list-style-type: none"> ■ Add a new sub-clause to acknowledge that there may be functional and operational requirements associated with the use and development of resources. <p>Or</p> <ul style="list-style-type: none"> ■ Delete Policy 31 and rely on Policy 32 to avoid, remedy or mitigate effects.
Biodiversity, aquatic ecosystem health and mahinga kai Policy 36	Support with amendment	<p>Vector supports the intent of the policy but has concerns that it fails adopt an effects based approach. The policy introduces what is in-effect a focus to continually minimise effects, whereas the reality for large infrastructure projects is often reaching an acceptable and balanced level of effects between different values (e.g. the best practicable option).</p>	<ul style="list-style-type: none"> ■ Amend Policy 36: <p>The adverse effects of use and development on the habitats of indigenous birds in the coastal marine area, wetlands and beds of lakes and rivers and their margins for breeding, roosting, feeding, and migration shall be <u>avoided, remedied or mitigated</u> minimised.</p>
Sites with significance Policy 39	Support wit amendment	<p>Vector supports the intent of the policy but has concerns in that it relates to all, not ‘significant’, adverse effects as some other policies do, and also that the term avoid sets a bottom line which is inconsistent with effects based planning.</p>	<ul style="list-style-type: none"> ■ Amend Policy 39: <p>The adverse effects of use and development on outstanding water bodies and their significant values identified in Schedule A (outstanding water bodies) shall be avoided, or <u>remedied or mitigated where avoidance is not practicable</u>.</p>
Sites with significant mana whenua values Policy 45	Support with amendment	<p>Vector supports this policy to the extent that it contemplates a scenario whereby effects may not be able to be avoided and furthermore, sets a process whereby effects can be assessed. Vector has concerns in respect of policy wording related to the adverse effects being managed with tikanga and kaupapa Maori as recommended in the cultural impact assessment, and also that the written consent of the authority be</p>	<ul style="list-style-type: none"> ■ Amend Policy 45: <p>In the first instance, activities in sites with significant mana whenua values identified in Schedule C (mana whenua) shall be avoided <u>where practicable</u>.</p> <p>If the site cannot be avoided, more than minor adverse effects on the significant mana whenua values must be evaluated through a cultural</p>

		obtained. These may not be achievable, especially in the context of a large infrastructure project. Cultural effects need to be balanced with other effects (inclusive of positive effects) and to set what is in effect a bottom-line requirement is inappropriate.	<p>impact assessment undertaken by the relevant iwi authority or iwi authorities. The adverse effects of activities shall be managed in accordance with tikanga and kaupapa Māori <u>and where practicable shall take into consideration any</u> as recommendations ed in the cultural impact assessment by:</p> <ul style="list-style-type: none"> (a) avoiding more than minor adverse effects, and (b) where more than minor adverse effects cannot be avoided, remedying them, and (c) where more than minor adverse effects cannot be remedied, mitigating them, and (d) receiving written consent of the iwi authority. <p>Where more than minor adverse effects on significant mana whenua values identified in Schedule C (mana whenua) cannot be avoided, remedied or mitigated, the activity is inappropriate. Offsetting of effects in sites with significant mana whenua values is inappropriate.</p>
Managing ambient Air Quality Policy P52	Support with amendment	Vector has an operational requirement to discharge natural gas to air e.g. tie-ing works and at delivery point as explained earlier in this submission. Natural gas is odourless, therefore, for health and safety reasons, an odorant is added to the gas to enable detection. The discharge of gas is managed to minimise adverse effects, and that being the case, Vector is generally supportive of policy 52(c).	<ul style="list-style-type: none"> ■ Amend Policy 52: <p>Ambient air quality shall be managed to protect human health and safety by:</p> <ul style="list-style-type: none"> (a) (c) managing the discharge of other contaminants so that the adverse effects on human health, including cumulative adverse effects, are <u>avoided, remedied or mitigated</u> minimised.
Managing Air Amenity Policy 55	Support subject to amendment		<ul style="list-style-type: none"> ■ Amend Policy 55: <p>Air quality amenity in urban, rural and the coastal marine areas shall be managed to minimise <u>so that</u> offensive or objectionable odour, smoke and particulate matter, fumes, ash and visible emissions <u>are minimised to the extent practicable</u>.</p>
Discharges to land and water Policy 62	Support	Vector notes that some of its construction activities may be assessed under this policy (e.g. dewatering for example). Vector generally	<ul style="list-style-type: none"> ■ Retain Policy 62:

		supports the intent of the policy which promotes land based discharges. Vector believes sufficient flexibility is provided in the policy where land based discharges are not possible or practicable.	The discharge of contaminants to land is promoted over direct discharges to water, particularly where there are adverse effects. . .
Discharges to water Policy 67	Support	Vector generally supports the intent of the policy. In doing so, it notes that it would have difficulty in meeting sub policy (a) and avoiding the production of contaminants from naturally occurring contaminants within the soils (Kapiti Coast having a high level of iron oxide for example), but that (a), (b) and (c) are following by the word 'or' which means that sub policy (d) can also apply. Vector adopts this approach of minimising the effects of discharges.	<ul style="list-style-type: none"> ■ Retain Policy 67: <p>The adverse effects of discharges of contaminants to land and water will be <u>avoided, remedied or mitigated</u> minimised by:</p> <ul style="list-style-type: none"> (a) avoiding the production of the contaminant, and/or (b) reusing, recovering or recycling the contaminant, and/or (c) minimising the volume or amount of the discharge, and/or (d) using land-based treatment, constructed wetlands or other systems to treat contaminants prior to discharge where appropriate, and (e) irrespective of actions taken in accordance (a) to (d) above, where a discharge is a point source discharge to a river or stream, the discharge achieves the water quality standards in Policy P71 after reasonable mixing.
Discharges to water Policy 72	Support with amendment	Vector notes the term zone of reasonable mixing is defined in the PNRP with a specific meaning which sets its extent. The policy is at odds with the definition and clarification is sought on this.	<ul style="list-style-type: none"> ■ Amend Policy 72: <p>Where not otherwise permitted by a rule, the zone of reasonable mixing shall be minimised and will be determined on a case-by-case basis. In determining the zone of reasonable mixing, particular regard shall be given to. . . .</p>
Discharges to water Policy 73	Support with amendment	Vector supports the intent of the policy but has concerns that it fails adopt an effects based approach. The policy introduces what is in-effect a continual requirement to minimise effects. Where effects have been minimised to the extent they are acceptable, then there should be no on-going requirement to minimise effects.	<ul style="list-style-type: none"> ■ Amend Policy 73: <p>The adverse effects of stormwater discharges shall be minimised <u>to the extent practicable</u>, including by:</p>
Contaminated land Policy 89	Support with amendment	Vector generally supports the intent of the policy but notes it introduces what is in-effect a continual requirement to minimise effects. Where effects have been minimised to the extent they are acceptable (i.e. remediated), then there should be no on-going requirement to minimise	<ul style="list-style-type: none"> ■ Amend Policy 89: <p>The discharge of hazardous substances from contaminated land, including closed landfills, is managed so that the significant adverse</p>

		<p>effects.</p> <p>Vector notes that the contaminated land policy does not address human health and this is supported. This is an issue for the district / city councils as opposed to the regional council.</p>	<p>effects on fresh water, including groundwater, <u>freshwater</u>, coastal water, and air is <u>are avoided or remedied, or where this is not possible mitigated to the extent practicable</u> minimised.</p>
Earthworks and vegetation clearance Policy 97	Support with amendment	<p>While generally supportive of the intent of the policy, Vector does not support the focus on minimise effects as it introduces what is in-effect a continual requirement to minimise effects. Where effects have been minimised to the extent they are acceptable, then there should be no on-going requirement to minimise effects. The focus should be on avoiding, remedying and mitigating to provide an enabling framework. Vector supports the notion of using good management practices.</p>	<ul style="list-style-type: none"> ■ Amend Policy 97: <p>The discharge of sediment to surface water bodies and coastal water from earthworks activities shall be minimised <u>avoided, remedied or mitigated to the extent practicable</u> by using a source control approach.</p> <p>Good management practices shall be used in site management, erosion and sediment control design operation and maintenance. in order to minimise the adverse effects of sediment laden stormwater discharges.</p> <p>Effects that cannot be minimised may be appropriately offset.</p>
Activities in beds of lakes and rivers Policy 102	Support with amendment	<p>Vector supports the intent of Policy 102(d) which provides an enabling framework for the reclamation or drainage of the beds of lakes and rivers where necessary for the development, operation, maintenance and upgrading of regionally significant infrastructure. It considers the term 'use' should also be included.</p>	<ul style="list-style-type: none"> ■ Amend Policy 102(d): <p>(d) necessary to enable the <u>safe, efficient and effective use</u>, development, operation, maintenance and upgrade of regionally significant infrastructure,</p> <p>(e) . . .</p> <p>(f) In respect of (a) to (e), <u>the method selected is the best practicable option of providing for the activity</u> there are no practicable alternative methods of providing for the activity; or</p>
Activities in beds of lakes and rivers Policy 105	Support with amendment	<p>Vector supports the intent of this policy to the extent that it protects trout habitat. However, Vector is concerned the policy introduces what is in-effect a continual requirement to minimise effects. Where effects have been avoided, remedied or mitigated to the extent they are acceptable, then there should be no on-going requirement to minimise effects.</p>	<ul style="list-style-type: none"> ■ Amend Policy 105 by adding 'to the extent practicable' to the end of sub clauses (b) and (e)
Site Dewatering Policy 126	Support with amendment	<p>Vector supports the intent of this Policy as in some areas where Vector works are required, dewatering is essential (i.e. Kapiti Coast). However,</p>	<ul style="list-style-type: none"> ■ Amend Policy 126 <p>Localised land subsidence or adverse effects of dewatering on existing</p>

		Vector is concerned the policy introduces what is in-effect a continual requirement to minimise effects. Where effects have been avoided, remedied or mitigated to the extent they are acceptable, then there should be no on-going requirement to minimise effects	groundwater users or the flows, levels or quality of surface water shall minimised <u>be avoided to the extent practicable.</u>
Chapter 5: Rules			
Abrasive blasting outside an enclosed booth – Rule 26	Support	Vector supports this pragmatic rule. A note should be added to provide clarity on what a noxious, dangerous, offensive or objectionable discharge is – refer to submission on Rule 27 or alternatively add it to the definitions to avoid repetition.	<ul style="list-style-type: none"> ■ Retain Rule 26: The discharge of contaminants into air from dry or wet abrasive blasting outside an enclosed area is a permitted activity, provided the following conditions are met: <ul style="list-style-type: none"> (a) the discharge shall not cause noxious, dangerous, offensive or objectionable odour, dust, particulate, smoke, vapours, droplets or ash beyond the boundary of the property, and (b) the operation of a mobile abrasive blasting unit used at one property is no more than 10 days in any 12 month period, and (c) abrasive blasting shall only be undertaken when it is impracticable to remove or dismantle or transport a fixed object or structure to be cleaned in an abrasive blasting booth, and (d) if the blasting is dry abrasive blasting, the blasting materials shall only be garnet, sodium bicarbonate, crushed glass, or agricultural materials including crushed corn cobs or walnuts, and (e) if the blasting is wet abrasive blasting, the blasting shall only use water, and (f) the free silica content of a sample of the blasting material shall not exceed 5% by weight, and (g) all work areas and surrounding areas are kept clean and substantially free of accumulations of deposited material and other debris.
Gas, water and wastewater processes Rule 34	Support with amendment	Vector supports the intent of the rule, including not using the 'property boundary' as a default permitted activity standard. In addition, Vectors considers an enabling provision for the temporary discharge of gas, including the odorant added to the gas to enable detection, should be enabled to acknowledge its activities such as tie-in works and venting to delivery stations.	<ul style="list-style-type: none"> ■ Amend Rule 34 The discharge of contaminants into air from the storage, conveyance and pumping of gas, water and wastewater is a permitted activity, provided the following conditions <u>are</u> is met: <ul style="list-style-type: none"> (a) the discharge shall not cause offensive or objectionable odour at the boundary of a sensitive activity; <p><i>Note: for the purposes of this rule, an offensive or objectionable odour</i></p>

			<i>is an odour that is considered to be offensive or objectionable by at least two independent observers; including at least one suitably trained Council officer, after considering the FIDOL (Frequency, Intensity, Duration, Offensiveness and Location).</i>
All other discharges Rule 41	Support	Vector supports a catch-all discretionary activity status. An enabling consenting framework is critical for infrastructure of regional significance.	<ul style="list-style-type: none"> ■ Retain the catch-all discretionary activity status.
Minor Discharges to Water Rule 42	Support	Vector generally supports Rule 42 which provides for minor discharges (i.e. those not otherwise covered by the plan rules), particularly the inclusion of dewatering as a permitted activity subject to not being from a contaminated land.	<ul style="list-style-type: none"> ■ Retain Rule 42 <p>The discharge of contaminants into water, or onto or into land where it may enter water that is not permitted, controlled, restricted discretionary, discretion, non-complying or prohibited by any other rule in this Plan is a permitted activity provided the following conditions are met:</p> <p style="padding-left: 40px;">(c) if the discharge is from dewatering, the discharge is not from contaminated land, and . . .</p>
Discharge of water to water Rule 43	Support	Vector supports the enablement of the discharge of water to water as a permitted activity as there are negligible effects associated with this activity, subject to compliance with the listed conditions. Vector sometimes undertakes hydro tests which require such activity to be undertaken.	<ul style="list-style-type: none"> ■ Retain Rule 43. <p>The discharge of water into water is a permitted activity, provided the following conditions are met:</p> <p style="padding-left: 40px;">(a) the discharge is to the same water body or area of coastal water it was taken from, and</p> <p style="padding-left: 40px;">(b) the quality of the discharged water is the same as or better than the quality of the water body or area of coastal water it was taken from, and</p> <p style="padding-left: 40px;">(c) the discharge shall not cause a change in temperature of more than 2°C in the receiving water after the zone of reasonable mixing, and</p> <p style="padding-left: 40px;">(d) the discharge shall not cause any erosion of the channel or banks of the receiving water body or the coastal marine area.</p>
Stormwater from an	Support	Vector supports intent of the rule which provides for the discharge of	<ul style="list-style-type: none"> ■ Retain Rule 48.

individual property Rule 48		stormwater into water, or onto or into land where it may enter a surface water body or coastal water, from an individual property as a permitted activity.	
All other stormwater – Rule 53	Support	Vector supports a catch–all discretionary activity status. An enabling consenting framework is critical for infrastructure of regional significance.	<ul style="list-style-type: none"> ■ Retain Rule 53: <p>The discharge of stormwater into water or onto or into land where it may enter water that is not permitted by Rules R48 or R49, or controlled by Rule R50, or a restricted discretionary activity under Rules R51 or R52, is a discretionary activity.</p>
Discharges inside sites of significance Rule 67	Oppose	Vector seeks a catch–all discretionary activity status for discharges from regionally significant infrastructure inside sites of significance. Vector considers this appropriate as the NRP must give effect to the RPS which requires such infrastructure to be recognised and provided for. Vector considers an enabling framework is required in this context.	<ul style="list-style-type: none"> ■ Amend Rule 67: <p>The discharge of water or contaminants into water, or onto or into land where it may enter water:</p> <ul style="list-style-type: none"> (a) inside a site or habitat identified in Schedule A (outstanding water bodies), Schedule F1 (rivers/lakes), Schedule F3 (significant wetland), or Schedule F4 (coastal sites), and (b) that is not permitted by Rules R42, R43, R44 or R45; (c) <i>that is not a discharge associated with a regionally significant infrastructure</i>
All other discharges to water - Rule 68	Support	Vector supports a catch–all discretionary activity status. An enabling consenting framework is critical for infrastructure of regional significance.	<ul style="list-style-type: none"> ■ Retain Rule 68.
Discharge of minor contaminants to land Rule 69	Support	Vector generally supports the intent of the rule which enables the discharge of minor contaminants as a permitted activity.	<ul style="list-style-type: none"> ■ Retain rule 69.
All other discharges to land - Rule 93	Support	Vector supports a catch–all discretionary activity status. An enabling consenting framework is critical for infrastructure of regional significance.	<ul style="list-style-type: none"> ■ Retain Rule 93.
Earthworks and vegetation clearance Rule 101	Support	Vector supports a catch–all discretionary activity status. An enabling consenting framework is critical for infrastructure of regional significance.	<ul style="list-style-type: none"> ■ Retain Rule 101

Existing structures in all wetlands - new rule		Vector seeks the inclusion of a rule which provides for existing structures as a permitted activity.	<ul style="list-style-type: none"> ■ Add a new rule for existing structures in all wetlands <p><i>Existing permitted or otherwise lawfully established structures in any wetland existing at the date of notification of the Proposed Natural Resources Plan, and the use of those structures, is a permitted activity.</i></p>
Activities in natural wetlands and significant natural wetlands Rule R107	Support with amendment	Vector supports a catch-all discretionary activity status for regionally significant infrastructure structures and activities in natural wetlands or significant natural wetlands.	<ul style="list-style-type: none"> ■ Amend Rule 107: <p>The following activities in a natural wetland or significant natural wetland except for those stipulated in and carried out in accordance with a restoration management plan under Rule R106:</p> <ul style="list-style-type: none"> (a) the placement of new structures with a footprint of 10m² or greater for the purpose of hunting and recreation (including maimai and jetties), and all other structures. . . . (b) <i>the operation, maintenance, replacement, upgrade and development of regionally significant infrastructure</i>
Activities in outstanding natural wetlands Rule 109	Support	Vector supports the rule which enables the maintenance, repair or replacement (like for like) of existing structures, and the removal of existing structures as a discretionary activity. Vector considers this appropriate as the NRP must give effect to the RPS which requires such infrastructure to be recognised and provided for. Vector considers an enabling framework is required in this context.	<ul style="list-style-type: none"> ■ Retain Rule 109 as it relates to the maintenance, repair and replacement of existing structures.
Existing structures in all rivers and lakes - new rule		Vector seeks the inclusion of a rule which provides for existing structures as a permitted activity.	<ul style="list-style-type: none"> ■ Add a new rule for existing structures in all rivers and lakes: <p><i>Existing permitted or otherwise lawfully established structures in any river or lake existing at the date of notification of the Proposed Natural Resources Plan, and the use of those structures, is a permitted activity.</i></p>
Activities in beds of lakes and rivers Rule 112	Support with amendment	Vector generally supports the rule which enables the maintenance, repair, replacement, and upgrade of existing structures in on or over the bed of a lake or river as a permitted activity. An amendment is sought in	<ul style="list-style-type: none"> ■ Amend Rule 112: <p>The maintenance, repair, replacement, upgrade or use of a structure</p>

		respect of sub-clause f) due to the nature of pipes and the inability for them to be contained within the form of the existing structure.	<p>or a part of a structure (excluding the Barrage Gates) that is fixed in, on, under, or over the bed of a river or lake, including any associated:</p> <ul style="list-style-type: none"> (a) disturbance of the river or lake bed, and (b) deposition on the river or lake bed, and (c) diversion of water, and (d) discharge of sediment to water <p>is a permitted activity, provided the following conditions are met:</p> <ul style="list-style-type: none"> (e) the activity shall comply with the beds of lakes and rivers general conditions specified above in Section 5.5.4, and (f) the resulting structure is contained within the form of the existing structure, <i>excluding any cable, pipe or duct</i>, or (g) the resulting structure, excluding any cable, pipe or duct and including any deposition, adds no more to the existing structure than whichever is the lesser of: <ul style="list-style-type: none"> (i) 5% of the plan or cross-sectional area of the structure in the river or lake bed, or (ii) 1m in horizontal projection and 1m in vertical projection measured from the structure as it was on the date of public notification of the Proposed Natural Resources Plan (31.07.2015) in the river or lake bed.
All other activities in river and lake beds Rule 129	Support	Vector supports a catch-all discretionary activity status. An enabling consenting framework is critical for infrastructure of regional significance.	<ul style="list-style-type: none"> ■ Retain Rule 129
Dewatering Rule 140	Support with amendment	Vector supports the intent of the rule to the extent that it enables dewatering as a permitted activity subject to conditions. However, Vector has concerns with sub-clause (d) to the extent that dewatering by its very nature does deplete water e.g. groundwater resources, meaning that the standard could never be complied with. Noting that surface waterbodies would likely be 'dewatered' via diversions to enable construction works, Vector seeks an amendment to reflect the issue raised with dewatering groundwater resources.	<ul style="list-style-type: none"> ■ Amend Rule 140: <p>The take of water and the associated diversion and discharge of that water for the purpose of dewatering a site, including but not limited to, maintenance, excavation, construction or geotechnical testing, is a permitted activity, provided the following conditions are met:</p> <ul style="list-style-type: none"> (a) the take continues only for the time required to carry out the work but does not exceed one month, and (b) the take and diversion and discharge is not from, onto or into

			<p>contaminated land or potentially contaminated land, and</p> <p>(c) the take does not cause ground subsidence, and</p> <p>(d) the take does not <i>permanently</i> deplete water in a water body, and</p> <p>(e) there is no flooding beyond the boundary of the property.</p> <p>Note Discharges to water, or onto or into land where it may enter water related to dewatering are provided for by Rule R42.</p>
All other takes and use – Rule 142	Support	Vector considers a default discretionary activity is appropriate for the activities this rule seeks to regulate. A discretionary activity status appropriately provides an enabling framework for regionally significant infrastructure. It is appropriate that the PNRP recognises and provides for regionally significant infrastructure.	<ul style="list-style-type: none"> ■ Retain Rule 142: <p>The take and use of water that would otherwise contravene sections 14(2) or 14(3) of the Resource Management Act 1991 and is not a permitted, controlled, restricted discretionary, discretionary, non-complying or prohibited activity is a discretionary activity.</p>
Geotechnical investigation bores – Rule 146	Support with amendment	Vector generally supports the rule in that it enables geotechnical bores as a permitted activity, subject to conditions.	<ul style="list-style-type: none"> ■ Amend Rule 146: <p>The use of land and the associated diversion and discharge of water or contaminants for the drilling, construction or alteration of a geotechnical investigation bore is a permitted activity, provided the following conditions are met:</p> <ol style="list-style-type: none"> (a) the bore is not located within a community drinking water supply protection area shown on Map 26, Map 27a, Map 27b, or Map 27c, and (b) there is compliance with the NZS 4411:2001 Environmental Standard for Drilling of Soil and Rock, and (c) a Wellington Regional Council bore/well log form is submitted to the Wellington Regional Council within one month of the bore being constructed, and (d) there is no flooding beyond the boundary of the property.
Drilling, construction or alteration of any	Support with amendment	Vector generally supports the controlled activity rule which provide certainty for applicants.	<ul style="list-style-type: none"> ■ Amend Rule 147: <p>The use of land and the associated diversion and discharge of water or</p>

bore – Rule 147			<p>contaminants for drilling, construction or alteration of a bore (other than a geotechnical investigation bore permitted in Rule R146) is a controlled activity, provided the following conditions are met:</p> <ul style="list-style-type: none"> (a) the bore is not associated with hydrocarbon exploration or production, and (b) the bore is constructed and operated in accordance with the NZS 4411:2001 Environmental Standard for Drilling of Soil and Rock
Drilling, construction or alteration of any bore – Rule 148	Support with amendment	Vector supports the catch –all discretionary activity status in that it provides an enabling framework.	<ul style="list-style-type: none"> ■ Amend Rule 148 <p>The use of land and the associated diversion and discharge of water or contaminants for drilling, construction or alteration of a bore that is not permitted by Rule R146 or controlled by Rule R147 is a discretionary activity.</p>