

Further Submission by Vector Gas Limited

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

24 March 2016

Further Submission on the Proposed Natural Resources Plan for the Wellington Region under Clause 8 of Schedule 1, Resource Management Act 1991

To Greater Wellington Regional Council (Council)

Name of submitter: Vector Gas Limited (Vector)

Vector is making this further submission in accordance with Clause 8 of Schedule 1, Resource Management Act 1991.

Vector has an interest in the Proposed Natural Resources Plan ('Proposed Plan') that is greater than the interest the general public has for reasons including the following:

- Vector has an interest as a landowner and occupier in respect of existing and future infrastructure which is potentially affected (directly or indirectly) by the relevant submissions; and/or
- Vector made an original submission on matters raised or affected by those submissions.

Vector's opposition to or support for a particular submission, including the reasons for that support or opposition and the relief sought, are identified in the detailed table included in Schedule 1 (attached).

Vector wishes to be heard in support of its further submission.

Due to the specific interests of Vector it will not consider presenting a joint case with others at a hearing.

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

Date: 24 March 2016

Schedule One: Further Submission by Vector Gas Ltd

Provision Number	Provision	Submitter Name and Submission Point	Submission Summary	Support/ Oppose	Reason	Allow/Disallow
Definitions						
17.00	2.2 Definitions	Wellington Electricity Lines Limited S126/011	Add a new definition for 'Maintenance' as follows: <i>"Maintenance means the replacement, repair or renewal of existing infrastructure and where the effects of that utility remain the same or similar in character, intensity and scale."</i>	Support	The proposed definition will provide clarity to plan users (for rule interpretation) as to what 'maintenance' provides for and is limited to.	Allow
189.00	Definition – upgrade	Wellington Electricity Lines Limited S126/008	Retain the definition of 'upgrade'.	Support	The proposed definition is appropriate to provide clarity to plan users (for rule interpretation) as to what 'upgrade' provides for and is limited to.	Allow
261.00	Objective 56: New development in the coastal marine area	KiwiRail Holdings Ltd S140/027	Amend Objective O56 New development in the coastal marine area is of a scale, density and design that is compatible with its function and its location in the coastal environment.	Support	The submission recognises that some uses, notably regionally significant, may have a functional need to be located in the coastal marine area.	Allow
264.10	4 Policies	Wellington City Council S286/006	Remove the use of 'avoid' in the policies.	Support in part	Vector believes the word can be applied in the policy framework, but it is important to also acknowledge that remediation and mitigation also apply. In addition, some development is restricted in terms of where it can locate and that some development, such as a regionally significant infrastructure, may generate adverse effects but deliver significant positive effects to the region and beyond. Only using the term 'avoid' is an extremely high threshold test in a consenting context.	Allow in part
272.00	Policy P8: Beneficial activities	CentrePort Limited S121/043	Amend Policy P8 as follows: ... h) maintenance, use <i>and upgrading</i> of existing structures in the coastal marine area, natural wetlands and the beds of rivers and lakes, and	Support	The relief sought is appropriate to recognise that upgrading is also a beneficial activity.	Allow
277.00	Policy P13: Existing regionally significant infrastructure and renewable electricity generation facilities	Royal Forest and Bird Protection Society S353/060	Add the words, "provided the adverse effects are avoided remedied".	Oppose	The policy relates to recognising the benefits of regionally significant infrastructure and renewable generation activities. Other policy provisions, against which Policy 13 will be balanced, manage the effects generated by that infrastructure.	Disallow
296.00	Policy P32: Adverse effects on aquatic ecosystem health and mahinga kai	Fish and Game S308/056	Delete Policy 32 in its entirety	Oppose	Vector considers Policy 32 is appropriate, especially in the context of regionally significant infrastructure which may generate adverse effects, but which may deliver significant positive effects.	Disallow
366.00	Policy 102: Reclamation or drainage of the beds of lakes and rivers	Fish and Game S308/069	Delete. Reclamation or drainage of the beds of rivers and lakes should be prohibited	Oppose	Applying a prohibited activity status to reclamation or drainage of the beds of lakes and rivers is inappropriate and not consistent with effects based planning.	Disallow
396.00	Policy P132: Functional need and efficient use	Royal Forest and Bird Protection Society S353/126	Add new provision (h) (h) adverse effects are managed in accordance with [new] Policy 41A	Oppose	The policy relates functional need and efficient use. Other policy provisions, against which Policy 132 will be balanced, manage the effects generated by use and development.	Disallow
519.00	Wetlands general conditions 5.5.2	Minister of Conservation S75/143	Amend the conditions: Wetland general conditions for activities in natural wetlands, (<i>including</i> significant natural wetlands and outstanding natural wetlands) are that: ... (e) in any part of the natural wetland <i>identified as</i> inanga spawning habitat identified in Schedule F4 (coastal sites) and Schedule F5 (coastal habitats), no bed disturbance, diversions of water or sediment discharge shall occur between 1 January 4 March and 31 May, and	Oppose	Vector understands the inanga spawning period to occur between 1 March and 31 May, inclusive of 'buffering' to avoid peak spawning periods.	Disallow
528.00	Beds of lakes and rivers general conditions 5.5.4	Minister of Conservation S75/151	Amend the conditions: (e) in any part of the river bed <i>identified as</i> inanga spawning habitat identified in Schedule F4 (coastal sites) and Schedule F5 (coastal habitats), no bed disturbance, diversions of water or	Oppose	Vector understands the inanga spawning period to occur between 1 March and 31 March, inclusive of 'buffering' to avoid peak spawning periods.	Disallow

			sediment discharge shall occur between <u>1 January</u> 4 March and 31 May, and			
529.00	Rule R112: Maintenance, repair, replacement, upgrade or use of existing structures (excluding the Barrage Gates) - permitted activity	Wellington City Council S286/050	Clarify whether temporary stream damming and diversion required for instream structure works (Rules 112- 118) are a covered by the rules (i.e. included in 'associated' works); If the temporary damming or diversion of water is not included, make it a permitted activity subject to appropriate conditions.	Support	The relief sought is appropriate. The Plan's rule interpretation (chapter 2) states that this approach has been sought to be adopted, where practicable. Vector considers it practicable in respect of Rule 112.	Allow