

# Section 32 report: Beneficial use and development

for the Proposed Natural Resources Plan for the Wellington Region



greater WELLINGTON

REGIONAL COUNCIL

Te Pane Matua Taiao



## Issues and Evaluation Report



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for the Proposed Natural Resources Plan for the  
Wellington Region

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## 1. Overview and purpose

This Section 32 report is the analysis of the appropriateness of the beneficial use and development objectives, policies and methods contained in the Proposed Natural Resources Plan for the Wellington Region (referred to in this document as the proposed Plan). This report is guided by the requirements of section 32 of the Resource Management Act 1991 (RMA).

The focus of this report is on the benefits derived from the use and development of land and water resources. It is acknowledged that use and development also has adverse environmental effects and in some cases these effects are significant. The management of the adverse effects of use and development on land and water resources is addressed in the following section 32 reports:

- Section 32 report: Soil conservation
- Section 32 report: Contaminated land and hazardous substances
- Section 32 report: Natural hazards
- Section 32 report: Water quality
- Section 32 report: Māori values
- Section 32 report: Discharges to land
- Section 32 report: Management of the coastal marine area
- Section 32 report: Wetlands
- Section 32 report: Aquatic ecosystems
- Section 32 report: Beds of lakes and rivers
- Section 32 report: Discharges to water
- Section 32 report: Livestock access, break-feeding and cultivation
- Section 32 report: Activities in the coastal marine area
- Section 32 report: Recreation, public access and open space
- Section 32 report: Natural heritage
- Section 32 report: Water quantity

These reports should be read in conjunction with this report as they provide detail on how these adverse effects will be managed.

Additionally, this report should be read in conjunction with the report 'Introduction to the Resource Management Act 1991 section 32 reports ' to

understand the context and approach for evaluation undertaken for the development of the proposed Plan.

The beneficial use and development objectives, policies and methods seek to recognise that land and water resources contribute to the social, cultural and economic wellbeing of people and communities. This is driven in a broad sense by section 5 of the RMA. There are also objectives, policies and methods that go further and provide a policy approach for a specific activity or group of activities such as for the development and operation of regionally significant infrastructure, renewable energy generation activities and catchment-based flood and erosion risk management activities.

The planning and policy instruments that have influenced the proposed Plan approach to beneficial use and development, including regionally significant infrastructure and renewable electricity generation activities, are the New Zealand Coastal Policy Statement 2010 (NZCPS), the National Policy Statement for Renewable Electricity Generation 2011 (NPS-REG), the National Policy Statement on Electricity Transmission 2008 (NPS-ET) and the Regional Policy Statement for the Wellington region 2013 (RPS). More detail on these documents can be found in Section 3 of this report.

The main point of difference for regionally significant infrastructure and renewable electricity generation activities compared to other activities is that they may have significant positive effects for people and communities as well as significant adverse effects. The NPS-REG, NPS-ET and RPS require the proposed Plan to recognise and provide for these benefits.

## **1.1 Report structure**

The report structure is based on the requirements of section 32 of the RMA. The structure of the report is shown below:

- *Resource management issues:* an outline of the main issues identified by the community. (Section 2 of this report)
- *Regulatory and policy context:* identification of relevant national and regional legislation and policy direction. (Section 3 of this report)
- *Evaluation of objectives:* an evaluation of the extent to which the proposed objectives are the most appropriate way to achieve the purpose of the RMA as required by section 32(1)(a) of the RMA. (Section 4 of this report)
- *Assessment of the policies, rules and other methods:* an assessment of the efficiency and effectiveness of the provisions in the proposed Plan as to whether they are the most appropriate way to achieve the objectives, in accordance with sections 32(1)(b) and 32(2) of the RMA. (Section 5 of this report)
- *Appendix:* summaries of appropriateness of proposed Plan objectives O2, O12 and O13 and of the efficiency and effectiveness of the options to give effect to these objectives

## 2. Resource management issues

Wellington Regional Council (referred to as WRC or the Council) began a region-wide engagement process with the community in 2010 to identify the views of the community regarding natural resource management and to help define the issues that the plan would address (Parminter 2011). This involved conversations with iwi partner organisations, the general public, agencies and organisations with interests in resource management, resource users, school children, developers and policy makers.

It is noted that the majority of issues related to the adverse effects of use and development on natural and physical resources. These issues were articulated in the issues report (GWRC 2014). The beneficial use and development issues are listed and described below (note that the issue numbers below relate to those used in the 2014 issues report).

The issues summarised in this report are:

- Issue 1.12 – Regionally significant infrastructure can have adverse effects on the surrounding environment, including people and communities
- Issue 1.13 – The use and ongoing operation or functioning of some regionally significant infrastructure can be adversely affected by inappropriate development

The relevance and significance of the two identified issues are discussed below. An issues table summarising the discussion is included in the Table A1 in the Appendix to this report.

There was no issue statement on the benefits of use and development of land and water at the general scale. The RMA anticipates that this use and development will occur, and its purpose is to manage the effects of this development. Use and development at a general scale is anticipated by the proposed Plan and has been integral in its development.

### 2.1 Issue 1.12: Effects of regionally significant infrastructure

*Regionally significant infrastructure can have adverse effects on the surrounding environment, including people and communities but enables communities to provide for their social, economic and cultural wellbeing.*

Regionally significant infrastructure is defined in the RPS. There are minor changes to this definition in the proposed Plan to increase its clarity and update the references to other legislation and documentation. The proposed Plan definition is as follows:

*Regionally significant infrastructure includes:*

- *pipelines for the distribution or transmission of natural or manufactured gas or petroleum*

- *strategic facilities to the telecommunication network, as defined in section 5 of the Telecommunications Act 2001*
- *strategic facilities to the radio communications network, as defined in section 2(1) of the Radio Communications Act 1989*
- *the national electricity grid*
- *facilities for the generation and transmission of electricity where it is supplied to the electricity distribution network, including the national grid*
- *the local authority water supply network and water treatments plants*
- *the local authority wastewater and stormwater networks, systems and wastewater treatment plants*
- *the Strategic Transport Network*
- *Wellington City bus terminal and Wellington Railway Station terminus*
- *Wellington International Airport*
- *Masterton Hood Aerodrome*
- *Paraparaumu Airport*
- *Commercial Port Area within Wellington Harbour and adjacent land used in association with the movement of cargo and passengers and including bulk fuel supply infrastructure, and storage tanks for bulk liquids, and associated wharflines*

Regionally significant infrastructure activities are those activities associated with the use, construction, operation, maintenance and upgrade of regionally significant infrastructure. They could involve activities such as earthworks, construction of new structures, reclamation and discharges to land and water.

The adverse effects associated with regionally significant infrastructure activities on the surrounding environment have been identified as an issue (GWRC 2014).

Regionally significant infrastructure is a significant physical resource that contributes to the social, cultural and economic wellbeing of people and the community. Regionally significant infrastructure activities are often large scale and have both significant positive and negative effects. The positive effects are often experienced at a regional or national scale whereas the adverse effects are more intensely experienced at the local scale.

Regionally significant infrastructure enables the movement of people and goods, provides for public health and safety, and access to energy and telecommunication services.

This issue has also been identified at the national level. The preamble of the NPS-REG notes that the adverse effects of renewable electricity generation activities often manifest themselves locally whilst the positive effects manifest themselves at the national scale. It also identifies another challenge that these activities often use natural resources and can be located in areas of significant value.

The NZCPS in the preamble recognises that the coastal environment contains established infrastructure, such as ports, airports, railways, roads and submarine cables. It also recognises that natural and physical resources such as renewable energy and mineral resources are important to the economic and social well-being of the nation and communities.

The original issue statement (GWRC 2014) has been modified to more accurately express the issue. The modification is shown as an underlined addition in the issue statement above. The original issue statement did not recognise that regionally significant infrastructure also has social, economic and cultural benefits to people and communities. The amendment acknowledges the benefits as well as the adverse effects. The main resource management issue is how to reconcile the positive national or regional benefits with the local scale adverse effects.

## **2.2 Issue 1.13: Effects on regionally significant infrastructure**

*The use and ongoing operation or functioning of some regionally significant infrastructure can be adversely affected by inappropriate development.*

The use and operation of regionally significant infrastructure activities can often adversely affect adjacent properties (GWRC 2014). These issues can particularly arise because new uses or developments have located adjacent to regionally significant infrastructure activities. This is more commonly an issue for territorial authorities as the use of land is most commonly managed through the district plan. However, the regional plan manages land use in the coastal marine area where this issue can occur. For example: the activities in the Commercial Port Area could be constrained by recreational or residential activities locating in close proximity to its activities through complaints about amenity and noise.

The issue has also been identified at the national level in the NPS-REG and NPS-ET. These documents both have objectives that require the management of reverse sensitivity effects upon regionally significant infrastructure. The issue statement in the RPS also identifies this as a regionally significant issue.

## **3. Regulatory and policy context**

### **3.1 Resource Management Act 1991**

#### **3.1.1 Purpose and principles – Part 2**

The Resource Management Act 1991 (RMA) creates a framework of planning and policy instruments at the national, regional and district level which work together to achieve its purpose of promoting the sustainable management of natural and physical resources. Section 5 of the RMA articulates this purpose and defines ‘sustainable management’ as:

*“managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while—*

- (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
- (b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
- (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.”*

Essentially, the purpose and principles in Part 2 of the RMA set up the overarching direction whereby use and development is managed to enable people and communities to provide for their social, economic, and cultural well-being and for their health and safety while managing the effects on the environment to provide for the needs of future generations and to safeguard the life-supporting capacity of air, water, soil and ecosystems.

Section 6, 7 and 8 identify matters of national importance to be recognised and provided for, other matters to be given particular regard to when managing natural and physical resources, and a direction to take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi), respectively. All parts of these sections are potentially relevant to use and development.

Regionally significant infrastructure and renewable energy generation activities are considered to be physical resources. Therefore, the parts of sections 6, 7, and 8 that directly relate to regionally significant infrastructure and renewable energy generation activities are:

*7(b) – the efficient use and development of natural and physical resources*

*7(ba) – the efficiency of the end use of energy*

*7(g) – any finite characteristics of natural and physical resources*

*7(i) – the effects of climate change*

*7(j) – the benefits to be derived from the use and development of renewable energy*

### 3.1.2 Functions of a regional council

The functions of a regional council are set out in section 30 of the RMA and primarily focus on the management of natural and physical resources. The functions that relate directly to beneficial use and development are:

*30(1)(a) – the establishment, implementation, and review of objectives, policies, and methods to achieve integrated management of the natural and physical resources of the region*

*30(1)(g)(b) – the strategic integration of infrastructure with land use through objectives, policies, and methods*

### 3.1.3 Summary

The provisions in the proposed Plan regarding beneficial use and development are largely derived from the overarching direction of Part 2 of the RMA and the specific functions of the regional council. The proposed Plan has taken these into account and provides a set of provisions that articulates some of the benefits derived from use and development controlled by the proposed Plan.

## 3.2 National policy statements and national environmental standards

Under section 67(3) of the RMA a regional plan must give effect to any national policy statement and the operative New Zealand coastal policy statement. The relevant documents in respect of beneficial use and development of land and water are summarised below.

### 3.2.1 National Policy Statement for Renewable Electricity Generation 2011

The National Policy Statement for Renewable Electricity Generation 2011 (NPS-REG) identifies two matters of national significance, namely, (i) the need to develop, operate, maintain and upgrade renewable electricity generation activities and (ii) to acknowledge their benefits.

The NPS-REG sets out an objective:

*“To recognise the national significance of renewable electricity generation activities by providing for the development, operation, maintenance and upgrading of new and existing renewable electricity generation activities, such that the proportion of New Zealand’s electricity generated from renewable energy sources increases to a level that meets or exceeds the New Zealand Governments’ national target for renewable energy generation.”*

The objective is supported by a number of policies that provide guidance for decision makers. Policies A and B guide decision-makers to recognise and provide for the national significance of renewable electricity generation activities including their benefits. Policy C1 acknowledges the practical constraints associated with renewable electricity generation activities and Policy C2 directs decision-makers to have regard to offsetting measures or environmental compensation when considering any residual environmental effects. Policy D guides decision-makers to manage reverse sensitivity effects on consented and existing renewable electricity generation activities. Policies E, F and G specifically direct regional policy statements and regional plans to include objectives, policies and methods (including rules within plans) to provide for the development, operation, maintenance, and upgrading of renewable electricity generation activities.

The NPS-REG provides clear direction to the proposed Plan to include objectives, policies and rules to manage both the positive and adverse effects of renewable electricity generation activities, of all scales, and to protect them from reverse sensitivity effects. The NPS-REG also provides useful definitions of national grid and renewable electricity generation activities.

### 3.2.2 New Zealand Coastal Policy Statement 2010

The purpose of the New Zealand Coastal Policy Statement 2010 (NZCPS) is to state policies in order to achieve the purpose of the RMA in relation to the coastal environment of New Zealand.

The NZCPS identifies the following key issues facing the coastal environment:

- A limited understanding of the coastal environment
- A loss of natural character, decline in species, habitats and ecosystems
- Poor and declining water quality
- A demand for coastal sites for infrastructures uses (including energy generation) to meet the economic, social and cultural needs of people and communities

The NZCPS sets out seven objectives for the management of the coastal environment. These objectives aim to safeguard ecosystems, preserve natural character, recognise the role of tangata whenua, maintain and enhance public open space, take into account climate change, enable people and communities to provide for their well-being and meet international obligations. Objective 6 is the most relevant to this report in that it seeks to enable people and communities to provide for their well-being and their health and safety through use and development.

The NZCPS contains 29 policies that seek to achieve these objectives. Policies 6, 9 and 10 are the most relevant in respect of the benefits of use and development.

Policy 6 relates to all activities in the coastal environment and seeks to provide for use and development including those activities that contribute to the social, economic and cultural well-being of people and communities, provide for the reasonably foreseeable needs of future generations or are nationally or regionally important and have a functional need to locate and operate in the coastal marine area.

Policy 9 recognises the need for an efficient national network of ports. This policy seeks to ensure that development does not adversely affect the efficient and safe operation of these ports and that plans consider how to provide for the operation and development of ports.

Policy 10 sets a strong policy direction to avoid reclamation unless the activity is required to be within the coastal marine area, there are no other practicable alternative methods and that it would provide a significant regional or national benefit. The policy goes on to state where a reclamation is considered to be a suitable use of the coastal marine consideration should be given to specified aspects of its form and design.

The NZCPS sets a very similar general policy direction to the other national policy statements for the regional plan but is more specific in respect of certain

activities such as reclamation and certain uses such as commercial port areas that occur in the coastal marine area.

### 3.2.3 National Policy Statement on Electricity Transmission 2008

The National Policy Statement on Electricity Transmission 2008 (NPS-ET) recognises the need to operate, maintain, develop and upgrade the electricity transmission network: *“The efficient transmission of electricity on the national grid plays a vital role in the well-being of New Zealand, and its people and the environment.”*

The NPS-ET has one objective, which sets out:

*To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while:*

- *Managing the adverse environmental effects of the network; and*
- *Managing the adverse effects of other activities on the network.*

The NPS-ET contains 14 policies that guide decision-makers and direct the regional council. Policy 1 directs decision-makers to recognise and provide for the national, regional and local benefits of electricity transmission. Policies 2 to 9 guide the management of the environmental effects of transmission, including the positive and negative effects and the recognition of the constraints of the transmission network. Policies 10 and 11 guide the management of reverse sensitivity effects in relation to the transmission network. Policy 12 and 13 are not relevant to the development of regional plans. Policy 14 directs regional councils to include objectives, policies and methods to facilitate long-term planning for investment in transmission infrastructure and its integration with land uses. Additionally, the NPS-ET includes a definition of the national grid and electricity transmission network.

The overarching direction of the NPS-ET is similar to that of the NPS-REG. The electricity transmission network is of national importance but can have adverse environmental effects or can be adversely affected by adjacent land uses. The proposed Plan must give effect to the policies of the NPS-ET.

### 3.2.4 National Environmental Standards for Electricity Transmission Activities 2009

The National Environmental Standards for Electricity Transmission Activities (NES-ETA) came into effect on 14 January 2010. The NES-ETA sets out a national framework for activities on existing electricity transmission lines. The NES-ETA sets up a permissive regime for electricity transmission activities that permit activities subject to conditions that do not allow significant adverse effects on the environment.

The NES-ETA only applies to existing high voltage electricity transmission lines. It does not apply to the construction of new transmission lines, to

substations or electricity distribution lines carrying electricity from regional substations to electricity users.

The relevant sections of the NES-ETA contain provisions for discharges from water blasting and applying protective coatings to power pylons and discharges to water. Additionally there is a catch all discretionary activity for all other transmission activities for which these regulations apply that is not described in the regulations as permitted, controlled or restricted discretionary. The NES-ETA also includes a definition of the existing transmission line, national grid and upgrading.

### 3.2.5 National Environmental Standards for Telecommunication Facilities 2008

The National Environmental Standards for Telecommunication Facilities 2008 (NES-TF) relates to the installation of masts, antennae and equipment cabinets and the emissions of electromagnetic radio-frequency. The NES-TF directs district plans and not regional plans.

The Ministry for the Environment released a discussion document in March 2015 proposing amendments to the NES-TF but this is in an early stage of development and has not been considered in the development of the provisions in the proposed Plan.

## 3.3 Regional policy statement

Under section 67(3) of the RMA a regional plan must give effect to any regional policy statement. The regional policy statement for the Wellington Region is summarised below.

### 3.3.1 Regional Policy Statement for the Wellington region 2013

The Regional Policy Statement for the Wellington region 2013 (RPS) identifies four regionally significant issues relevant to the beneficial use and development of natural resources (land and water). These are as follows:

*The Wellington region is dependent on externally generated electricity and overseas-sourced fossil fuels and is therefore vulnerable to supply disruptions and energy shortages. In addition, demand for energy is increasing. However, significant renewable energy resources exist within the region.*

*There is a limited amount of water in water bodies available for human use and demand is increasing. The efficient management of water in the region's water bodies is a matter of vital importance for sustaining well-being of people, communities and the regional economy.*

*Infrastructure enables communities to provide for their social, economic and cultural well-being and existing infrastructure can be adversely affected when incompatible land uses occur under, over or adjacent.*

*There are limited mineral resources in the region and demand for these will increase. A sustained supply of mineral resources is essential to provide for the well-being of the regional and local communities and the people of Wellington,*

*and for the regional economy. There are also benefits from extracting mineral resources locally.*

These issues are addressed through the objectives, policies and other methods of the RPS. There are three directly relevant objectives. Objective 9 sets an energy outcome that the region's energy needs are met in an efficient, diverse and renewable range of resources. Objective 10 sets an outcome that the social, economic, cultural and environmental benefits of regionally significant infrastructure are recognised and protected. Objective 30 sets an outcome that the demand of mineral resources is met from resources located in close proximity to the areas of demand.

Policies 7, 8, 39 and 60 seek to achieve these objectives. Policy 7 directs regional plans to include policies and/or methods that recognise the benefits of regionally significant infrastructure and energy generated from renewable energy resources.

Policy 8 is another directive policy that requires regional plans include policies and rules that protect regionally significant infrastructure from incompatible new subdivision, use and development occurring under, over, or adjacent to the infrastructure.

Policy 39 is a consideration policy that requires that regional plans to have particular regard to the benefits of renewable energy resources and/or regionally significant infrastructure, the protection of regionally significant infrastructure from incompatible subdivision, use and development, the need for renewable electricity generation facilities to locate where the renewable energy resources exist and significant wind and marine renewable energy resources within the region.

Policy 60 is a consideration policy that requires regional plans to have particular regard to the social, economic, and environmental benefits from utilising mineral resources within the region and protecting significant mineral resources from incompatible or inappropriate land uses alongside.

The RPS also includes a definition of regionally significant infrastructure. The definition is as follows:

*“Regionally significant infrastructure includes:*

- *pipelines for the distribution or transmission of natural or manufactured gas or petroleum*
- *strategic telecommunications activities, as defined in section 5 of the Telecommunications Act 2001*
- *strategic radio communication activities, as defined in section 2(1) of the Radio Communications Act 1989*
- *the national electricity grid, as defined by the Electricity Governance Rules 2003*
- *activities for the generation and transmission of electricity where it is supplied to the network, as defined by the Electricity Governance Rules 2003*

- *the local authority water supply network and water treatments plants*
- *the local authority wastewater and stormwater networks, systems and wastewater treatment plants*
- *the Strategic Transport Network, as defined in the Regional Land Transport Plan 2015*
- *Wellington City bus terminal and Wellington Railway Station terminus*
- *Wellington International Airport*
- *Masterton Hood Aerodrome*
- *Paraparaumu Airport*
- *Commercial Port Area within Wellington Harbour and adjacent land used in association with the movement of cargo and passengers and including bulk fuel supply infrastructure, and storage tanks for bulk liquids, and associated wharflines”*

The RPS also contains objectives and policies that direct the management of other natural and physical resources such as biodiversity, water quality, water quantity and the coastal environment. These are relevant when considering the adverse effects of use and development on the environment. These are discussed in the relevant section 32 reports identified above in Section 1 of this report.

### 3.3.2 Summary of national and regional level policy direction

The national and regional level policy directions present a common theme that there are some activities that have significant benefits to people and communities but due to their scale or nature also have the potential to have significant adverse effects. The direction is that these activities require recognition in regional plans and the management of these activities should be specifically addressed.

The national level policy direction for this report is specific to the coastal marine area, renewable electricity generation activities and electricity transmission lines. The RPS is considered to give effect to the above mentioned national policy statements. The RPS created a term ‘regionally significant infrastructure’ which includes other infrastructure types and develops a policy direction similar to the national policy direction which the proposed Plan must now give effect to.

## 3.4 Regional plans

### 3.4.1 Operative regional plans

#### **Regional Freshwater Plan**

The operative Regional Freshwater Plan 1999 (referred to as the RFP) identified a number of issues about the benefits of use and development of freshwater resources. These issues recognised the benefits of water bodies to people and communities and the complexities of managing the demand and use of freshwater.

The objectives of the RFP are to provide for the use and development of freshwater resources for the wellbeing of people and communities (Objective 4.1.11) whilst avoiding, remedying and mitigating any adverse effects

(Objective 4.1.12) and promoting activities that enhance freshwater resources (Objective 4.1.13).

There are a number of policies that seek to achieve these objectives. The policies range from a generic policy (Policy 4.2.23) that requires decision-makers to have regard to the benefits arising from a proposal to more specific policies that provide for activities that have no more than minor adverse effects on the environment (Policy 4.2.33).

In 2012, Policy 4.2.33A was introduced as part of Plan Change 5 to the RFP. This was a plan change instigated by the New Zealand Transport Agency (NZTA) to facilitate the Transmission Gully project which is in place to construct a significant motorway link in the Wellington Region north of Wellington City. The policy is specific to Transmission Gully and was proposed because NZTA considered that Policy 4.2.33 did not provide for this particular project. Policy 4.2.33A guides the management of adverse effects of the Transmission Gully project.

### **Regional Coastal Plan**

The operative Regional Coastal Plan 2000 (referred to as the RCP) identified a number of issues about the benefits of use and development of the coastal marine area. These issues recognised the need to provide a framework to facilitate appropriate activities within the coastal marine area. There were also two specific areas identified with special characteristics, the Lambton Harbour area and the Port of Wellington. There are also a number of activity-specific management issues which identify that there are a number of uses in the coastal marine area that have minimal adverse effects and should be provided for.

The objectives of the RCP aim to provide for appropriate uses and developments within the coastal marine area (Objective 4.1.2) including development within the Lambton Harbour Development Area (Objective 4.1.24). There is a separate objective about the Port of Wellington which recognises the importance of the port to the social and economic wellbeing of the region (Objective 4.1.26).

There are a number of policies that seek to achieve these objectives. Policies 4.2.7, 4.2.43 and 4.2.44 recognise that port and harbour activities are an appropriate use of the coastal marine area provided environmental protection policies are satisfied. Policy 4.2.6 recognises the importance of the coastal marine area for navigation. Policy 6.2.10 specifically protects the flight approach paths to certain airports. Policy 4.2.23 also recognises aquaculture as an appropriate use. Policy 4.2.45 provides for use and development in the Lambton Harbour Development Area.

There are a number of specific rules that allow for development within the Commercial Port Area, protect the operation of the Commercial Port Area, and protect the flight approach path for Wellington International Airport and Kapiti Coast Airport.

### 3.4.2 Proposed Natural Resources Plan

The proposed Plan provides a rational and clear policy direction regarding beneficial use and development of land and water resources. It is based on the RMA and on national and regional level policy direction.

There is a general objective, Objective O2 that seeks to recognise the contribution and importance of land and water to the well-being of people and the community. This objective sits as one of the overarching objectives of the proposed Plan and is an underlying premise of the RMA. The proposed Plan in its entirety seeks to achieve this objective with a few activity-specific provisions where appropriate.

There are specific objectives, Objective O12 and O13 relating to regionally significant infrastructure and renewable energy generation activities that seek to recognise their benefits and protect them from incompatible uses. These objectives essentially are derived from the sense that there are some activities that have a greater benefit to society and contribute more to social, economic and cultural well-being than others. These objectives also give effect to national and regional policy direction, including the NPS-REG, NPS-ET, NZCPS and RPS. These objectives are generally achieved through a mix of generic and activity-specific provisions.

This framework allows both the benefits and adverse effects of regionally significant infrastructure and renewable energy generation activities to be considered on a case-by-case basis. The policies recognise that these types of activities have benefits but the scale of the benefits will still need to be justified and balanced against the adverse effects of the activity as per any other activity.

## 4. Evaluation of the objectives

Section 32(1)(a) of the RMA requires that an evaluation report must “examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of the [RMA]”.

The appropriateness test as applied in this report consists of four standard criteria: relevance, usefulness, reasonableness and achievability. These criteria can be summarised as follows:

- *Relevance* – is the objective related to addressing a resource management issue? Will it achieve one or more aspects of the purpose and principles of the Resource Management Act?
- *Usefulness* – will the objective guide decision-making? Does it meet sound principles for writing objectives?
- *Achievability* – can the objective be achieved with tools and resources available, or likely to be available, to the local authority?
- *Reasonableness* – what is the extent of the regulatory impact imposed on individuals, businesses or the wider community?

## 4.1 Proposed objectives

A brief description of each of the proposed beneficial use and development objectives is provided below. Tables A2, A3 and A4 in the Appendix provide an evaluation of the appropriateness of the proposed objectives against the four criteria discussed above.

The objectives for beneficial use and development in the proposed Plan are largely driven by the purpose of the RMA and national and regional level policy direction which the regional plan must give effect to.

The operative plans are silent on regionally significant infrastructure and renewable energy generation activities, except for a limited reference via a plan change to the RFP in respect of Transmission Gully. This is largely due to the age of the operative plans. Since the operative plans were written there have been national policy statements gazetted for both renewable electricity generation facilities and electricity transmission and the WRC has produced a second generation RPS. These all provide direction and are summarised above in Section 3 of this report. On a general scale the operative objectives are relevant and useful but require some amendment to align with national and regional level policy direction.

### 4.1.1 Objective O2

*The importance and contribution of land and water to the social, economic and cultural wellbeing of the community are recognised.*

This objective is an amended version of the objectives in the operative regional plans. The objective is relevant as it stems from the purpose of the RMA which enables people and communities to meet the reasonable foreseeable needs of future generations. The objective is achievable and sets a policy direction for the life of the proposed Plan. The ability to use resources, within boundaries, is implied by the RMA. This objective clarifies that the importance and contribution of land and water is considered within the sustainable management of land and water.

The objective is reasonable and useful as it responds to the community engagement undertaken by WRC and recognises all uses of land and water including forestry, primary production activities, contact recreation, amenity values, Māori customary use, urban industries, urban residential development, large-scale earthworks and land disturbance activities, and mineral extraction activities. There is little reason to single out any specific industry at the objective level of the proposed Plan because no single industry dominates GDP statistics in the Wellington Region (Infometrics 2015).

### 4.1.2 Objective O12

*The social, economic, cultural and environmental benefits of regionally significant infrastructure and renewable energy generation activities are recognised.*

This objective derives from the issue that regionally significant infrastructure and renewable energy generation activities can have adverse effects on the surrounding environment, including people and communities. At the same time

it provides for social, economic and cultural well-being and the health and safety of people. The objective is intended to recognise the benefits of both regionally significant infrastructure and renewable electricity generation activities whilst the adverse effects of these activities are addressed in the other provisions of the proposed Plan.

This objective will help give effect to the following national and regional level policy:

- Objective 6 and Policies 6, 9, and 10 of the NZCPS. These provisions recognise the importance of regionally significant infrastructure and/or renewable electricity generation activities
- The NPS-REG which requires a regional plan to recognise and provide for the national significance of renewable electricity generation activities
- The NPS-ET which requires the plan to recognise and provide for the national, regional and local benefits of electricity transmission
- Policy 7 of the RPS which requires the regional plan to recognise the benefits of regionally significant infrastructure and energy generation from renewable energy resources

The proposed Plan uses the term ‘renewable energy generation activities’. This includes any energy generated from renewable energy resources. The regional plan definition uses the wording from the NPS-REG definition for renewable electricity generation activities but it has been expanded to include all energy generation activities.

This objective is relevant and reasonable as it gives effect to national and regional level policy statements. The objective sets a clear direction for the regional plan that will be useful to decision-makers and achievable over the lifetime of the proposed Plan.

#### 4.1.3 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.*

This objective derives from the issue that the use and ongoing operation of regionally significant infrastructure and renewable energy generation activities can be adversely affected by new incompatible land uses or activities occurring under, over or adjacent. This is mainly due to reverse sensitivity effects.

The operative plans are silent on regionally significant infrastructure and renewable energy generation activities, except in respect of the Commercial Port Area and flight approach paths to Kapiti Coast Airport and Wellington International Airport. As mentioned above in Section 4.1.2 this is largely due to the age of the operative plans and new national and regional level policy direction which is detailed above in Section 3 of this report.

This objective will help give effect to the following national and regional level policy:

- Objective 6 and Policies 6, 9, and 10 of the NZCPS. These provisions recognise the importance of regionally significant infrastructure and/or renewable electricity generation activities
- The NPS-REG which requires a regional plan to recognise and provide for the national significance of renewable electricity generation activities
- The NPS-ET, particularly Policies 10 and 11
- Policy 8 of the RPS which requires the regional plan to protect regionally significant infrastructure from adjacent new incompatible development

This objective is relevant and reasonable as it gives effect to national and regional level policy statements. The objective sets a clear direction for the regional plan that will be useful to decision-makers and achievable over the lifetime of the proposed Plan.

#### 4.1.4 Conclusion

The proposed objectives seek to address the shortcomings of the RFP and RCP provisions, and create a clear and efficient policy tool with which decision-makers and plan users can assess proposals.

Objectives O2, O12 and O13 and Tables A2, A3 and A4 in the Appendix, respectively, show that they are appropriate because they:

- Recognise the ‘enabling’ concept in the purpose of the RMA
- Give appropriate effect to national and regional level policy direction, particularly the RPS
- Use language and terminology that is consistent with the RMA, national policy statements and the RPS
- Reflect and respond to the values approach adopted in the proposed Plan
- Provide decision-makers with a suite of assessment tools that will enable consistent and comprehensive consideration of the full range of effects both adverse and positive associated with regionally significant infrastructure and renewable energy generation activities

The assessment also shows that the proposed objectives incorporate the relevant considerations of the operative objectives, but in a manner that is more efficient and comprehensive than the suite of operative objectives. The objectives as detailed in the proposed Plan are more relevant and useful in achieving the purpose of the RMA, and it is proposed that they replace the existing operative objectives.

## 5. Assessment of the policies, rules and other methods

Section 32(1)(b) requires an examination of whether the provisions are the most appropriate way to achieve the objectives by identifying other reasonably practicable options for achieving the objectives and assessing the efficiency and effectiveness of the provisions in achieving the objectives. Section 32(2) expands further on the assessment of efficiency and effectiveness.

*32(2) An assessment under subsection (1)(b)(ii) must—*

- (a) identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—*
  - (i) economic growth that are anticipated to be provided or reduced; and*
  - (ii) employment that are anticipated to be provided or reduced; and*
- (b) if practicable, quantify the benefits and costs referred to in paragraph (a); and*
- (c) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions*

The discussion of the policies and methods below is focused around the achievement of each objective. Tables A5, A6 and A7 in the Appendix provide an analysis of options and identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of these provisions.

### 5.1 Beneficial use and development

Objective O2 recognises the importance and contribution of land and water to well-being and is an overarching objective for the proposed Plan. However, there are some specific policies that seek to achieve this objective. These are shown in the following table.

**Table 1: Provisions directly relating to the general importance of land and water**

Objective:	O2: The importance and contribution of land and water to the social, economic and cultural well-being of the community are recognised.
Policies:	Policy P7: Uses of land and water Policy P8: Beneficial activities Policy P11: In-stream water storage Policy P15: Flood protection activities Policy P16: New flood protection and erosion control Policy P102: Reclamation or drainage of the beds of lakes and rivers
Rules:	No specific rules
Method:	No specific methods

The preferred approach (Option 2, Table A5 in the Appendix) for the proposed Plan consists of two policy streams. Firstly, the entire plan seeks to achieve Objective O2 through the policies, rules and other methods. As mentioned previously it is a fundamental principle of the RMA and is expressed in section 5. The requirement for people and communities to provide for their well-being has been considered in the development of all the provisions within the proposed Plan.

The second and complimentary policy stream identifies some specific policies that seek to achieve this objective. These include two general policies and some activity-specific provisions. The general policies provide a general policy direction about recognising the benefits of the use of land and water and acknowledging that some activities are beneficial. There are two areas, flood protection and in-stream water storage where it is appropriate to establish more specific policy direction. These two areas were identified as needing specific mention due to the scale of their benefits and effects.

In respect of flood protection WRC manage a number of rivers within the Wellington Region to reduce flood risk to people, communities and infrastructure. WRC flood protection infrastructural assets include stopbanks, outlet structures (culverts and pipes), berms, bank edge protection structures (vegetation and more permanent materials), debris arrestors, detention dams, barrage gates, flood and retaining walls and land within river corridors. Flood protection infrastructural assets are located in the Hutt, Ōtaki, Waikanae, Wainuiomata, Porirua and Ruamāhanga catchments. The supporting information to the Draft Long Term Plan 2015-2025 – Shape your region noted that across the region these assets had a replacement value of \$262.8 million as at 30 June 2012 (GWRC 2015).

WRC also undertakes flood protection and control works within the beds of rivers and the coastal marine area on an ongoing basis, generally for the purposes for maintaining or improving flood protection infrastructural assets in the catchments described above. These works include river and stream mouth cutting, mouth dredging (Te Awa Kairangi/Hutt River only), gravel extraction, river realignment, beach and bed contouring, bank edge protection (using rock and/or, vegetation), flood and retaining walls and stopbanks. These works can be extensive and can also occur, to a lesser extent, in smaller watercourses managed by WRC.

In the major rivers WRC has river schemes or floodplain management plans in place. Many of the major river schemes have been in place for a substantial period of time often coinciding with increasing urban development of floodplain areas. The Soil Conservation and Rivers Control Act 1941 requires WRC to maintain these schemes.

Since the 1990s WRC has moved river management activities into floodplain management plans. There are floodplain management plans in place for the Hutt River (2001), Ōtaki River (1998) and the Waikanae River (1996). In addition, the Waitohu Stream Study (2006) and Porirua Stream works largely fulfil the requirements of a floodplain management plan. Flood plain management plans are under development for the Te Kāuru (Upper

Ruamāhanga River), the Waiohine River, the Pinehaven Stream, the Mangaroa River and the Waiwhetu Stream. Floodplain management plans outline a holistic approach to reducing the effects of flooding, including physical protection, non-structural measures, and environmental opportunities. These plans are comprehensive and involve extensive information gathering, consultation and discussion with local community, councils and iwi.

Flood protection and control works primarily contribute towards achieving a resilient community and also contribute towards a strong economy, healthy environment and engaged community.

Adverse effects on the environment of the construction and maintenance of flood protection infrastructural assets and works across the region must be balanced against the wider public benefit as defined through the floodplain management plan process. For these reasons the proposed Plan includes specific policies that provide for catchment based flood and erosion risk management activities. The proposed policy approach is wider than WRC and includes any local authority as they have the ability to undertake similar works for similar public benefits.

The policy approach is similar to that for regionally significant infrastructure. Policy P15 provides guidance to decision-makers that the use, maintenance and on-going operation of existing catchment-based flood and erosion risk management activities which manage the risk of flooding to people, property, infrastructure and communities are beneficial and generally appropriate. Policy P16 states that the benefits of new catchment-based flood and erosion risk management activities are recognised. There is also Policy P104 that protects structures that are part of catchment based flood and erosion risk management activities from the effects of other activities by avoiding more than minor effects of these structures.

In the rules of the proposed Plan certain activities have a different activity status such as Rules R193 and R200 provided that they are undertaken by a local authority for flood protection or erosion control purposes. These rules are primarily in the coastal marine area as this is where these activities are tightly controlled for other users. In the beds of rivers there are more people undertaking works in rivers and it was not considered appropriate to have specific rules. Refer to the Section 32 report: Beds of lakes and rivers and Section 32 report and Section 32 report: Activities in the coastal marine area for more detail on these specific provisions.

There is the potential within the life time of the proposed Plan that large-scale in-stream water storage projects will be proposed. These could be for rural land irrigation, water supply or renewable energy generation purposes. These proposals may have significant benefits to people and communities at the regional scale but may also have significant adverse effects at the local scale. Water storage allows for the use of water when direct takes from the hydrological system (surface water or groundwater) are not available due to minimum flow levels. This approach has social and economic benefits to people and communities.

It is considered appropriate to provide a specific policy that guides decision-makers to recognise the benefits of in-stream water storage when certain circumstances exist. These circumstances are when a project has significant social and economic regional benefits, water remains available for multiple in-stream and out-of-stream uses concurrently, and the reliability of water supply improves as a result, and it contributes to the efficient allocation or use of water. This does not preclude the justification of the benefits and the assessment of the adverse effects.

It is noted that the proposed Plan encourages the storage of water outside the bed of a river. This approach is discussed in the Section 32 report: Water quantity. In particular Policies P117 and P120 recognise that above median river flows water is often readily available. Provided that flushing flows and some river flow above median flow is maintained, taking water is enabled because it will not result in adverse effects on ecosystem health or mahinga kai.

The two other options considered were to stay silent in the policies on the importance of land and water resources for the well-being of the community, as this importance is integral to the purpose of the RMA and does not necessarily have to be stated within the proposed Plan. The second option was to retain the status quo which provides for some recognition of the importance of land and water to well-being.

The costs and benefits associated with the various options are relatively similar as the policy direction is integral to the purpose of the RMA. Staying silent in the policy framework about the general benefits of use and development does not mean that the benefits do not get considered.

The main benefit of having a specific policy framework is that the community can see their values articulated in the proposed Plan as it recognises community uses of land and water. There are benefits to local authorities and communities in having policy direction for catchment-based flood and erosion risk management activities and large in-stream water storage as these activities in certain circumstances have significant benefits to the community. The preferred option would reduce the uncertainty and cost to resources users and the community while still providing for the benefits and managing the adverse environmental effects.

The risk of acting or not acting in this policy space is relatively low give that it is integral to the purpose of the RMA which would be considered even if the proposed Plan was silent.

Table A5 in the Appendix contains an evaluation of the effectiveness and efficiency of the proposed provisions against the status quo, and concludes that the preferred approach is the most appropriate to achieve the objective.

## **5.2 Benefits of regionally significant infrastructure and renewable electricity generation activities**

Objective O12 recognises the benefits of regionally significant infrastructure and renewable electricity generation activities. Table 2 shows the links to the relevant policies, rules and methods that seek to achieve this objective.

**Table 2: Provisions directly relating to the benefits of regionally significant infrastructure**

Objective:	O12: The wider social, economic, cultural and environmental benefits of regionally significant infrastructure and renewable energy generation activities are recognised.
Policies:	Policy P12: Benefits of regionally significant infrastructure and renewable energy generation activities Policy P13: Existing regionally significant infrastructure and renewable energy generation activities Policy P102: Reclamation or drainage of the beds of lakes and rivers Policy P138: Structures in sites with significant values Policy P143: Deposition in a site of significance Policy P144: Dumping Policy P145: Reclamation, drainage and destruction in the coastal marine area
Rules:	Rule R160: Structures inside the Cook Strait Cable Protection Area Rules R173, R174 and R175: Structures inside the Commercial Port Area Rules R200, R201, R202 and R203: Dredging for commercial port and navigation purposes Rule R214: Reclamation and drainage by regionally significant infrastructure outside of sites of significance
Method:	No specific methods

The five operative regional plans do not specifically address regionally significant infrastructure and renewable energy generation activities except in relation to specific activities such as commercial port and airport activities. This approach is not acceptable given the national and regional level policy direction that has come into force since the development of the operative regional plans. Due to the certainty of this information and the requirement on the proposed Plan to give effect to this policy direction, the risk of not acting is too great.

The preferred approach (Option 3, Table A6 in the Appendix) to achieve Objective O12 seeks to integrate the recognition of regionally significant infrastructure and renewable energy generation activities across the proposed Plan. There are a number of policies that work together at different scales, from a general scale to an activity specific scale, to achieve this recognition.

At the general scale, the proposed Plan includes two high-level policies that relate to all regionally significant infrastructure and renewable energy generation activities. Policy P12 recognises and identifies the benefits of regionally significant infrastructure and renewable energy generation activities. Policy P13 acknowledges that the operation, maintenance and upgrade of existing regionally significant infrastructure and renewable energy generation activities are generally appropriate. The term ‘upgrade’ has been defined as “use and development to bring existing structures or activities up to modern standards provided that the adverse effects of the activity are the same or similar in character, intensity and scale as the existing structure and activity”. This puts limits to the extent Policy P13 is applicable in terms of scale and intensity. These policies give effect to the relevant provisions in the NZCPS, NPS-REG, NPS-ET and RPS at a general scale.

However, sitting as a separate policy stream these policies result in some uncertainty for decision-makers who, in respect of regionally significant infrastructure activities, are often required to balance significant adverse effects against significant positive effects, some of which will apply at national versus regional scale.

Hence, the preferred approach goes one step further and proposes two types of activity-specific provisions for regionally significant infrastructure in the proposed Plan where it is considered necessary to be more explanatory. These are provisions that create an exception for regionally significant infrastructure and provisions for a specific type of regionally significant infrastructure, which requires a specific management approach. The exception is either through the policy and rule framework or by providing a framework for specific types of regionally significant infrastructure activities.

This approach reduces the uncertainty in decision-making for all parties. It provides clearer guidance to decision-makers when making difficult decisions on resource consent applications that have the potential to have significant adverse effects on the environment but also have significant benefits to the wider community. A reduction in uncertainty potentially equates to a reduction in costs to both the resource user and community.

The proposed Plan discourages some activities for example reclamation associated with piping a stream and certain activities within sites with significant values. This is done most commonly through the use of a non-complying activity rule status. The justification for a non-complying activity for these activities is included in the relevant section 32 reports.

In respect of regionally significant infrastructure, consideration has been given to lowering the activity status to discretionary. This was considered to be inappropriate given the potentially significant adverse effects associated with these activities. The potential costs to the environment were considered too great. The benefits would still need to be justified and quantified and considered against the adverse effects of the activity.

The preferred approach of the proposed Plan is to provide an except for regionally significant infrastructure activities at the policy level rather than a lower activity status. The proposed Plan includes policies that state that activities such as reclamation, destruction, new structures, deposition and dumping when associated with regionally significant infrastructure activities may be appropriate (Policies P102, P138, P143, P144, P145). These policies do not override the need to consider the adverse effects associated with the proposal. These policies recognise that if these activities occur as part of a regionally significant infrastructure activity they may potentially be appropriate but this is still dependent on a case-by-case assessment of the effects of the proposal.

There is one instance in the proposed Plan where it has been considered appropriate to provide for a lower activity status for regionally significant infrastructure activities. Rule R214 provides for the assessment of reclamation and drainage within the coastal marine area not within a site with significant

values as a discretionary activity rather than a non-complying activity as per other activities. This aligns with NZCPS direction which takes a direction against reclamation except when there are regional or national benefits.

The second type of activity specific provision provides for specific types of regionally significant infrastructure activities, such as stormwater and wastewater networks and the Commercial Port Area. The proposed Plan includes a comprehensive suite of policies and rules that manage discharges from stormwater and wastewater networks. These provisions recognise the significant human health and safety benefits that these networks provide but also seek to reduce the adverse effects of the discharges on the receiving environment. For more detail on these provisions refer to the Section 32 report: Discharges to water.

Wellington City is home to CentrePort. CentrePort services central New Zealand. Approximately 4,200 ships call into CentrePort on an annual basis moving \$3.5 billion worth of cargo (CentrePort Wellington 2014). The proposed Plan includes provisions that are specific to the Commercial Port Area and associated navigation tracks. These are also included in the definition of regionally significant infrastructure. The Commercial Port Area is unique in that it has a functional need and an operational requirement to be located within the coastal marine area. This is recognised in the NZCPS. The existing operative Regional Coastal Plan includes specific provisions related to the Commercial Port Area that recognise the day-to-day activities that are undertaken in this area and the need for the port to continue to operate in this area.

The preferred approach in the proposed Plan, as per other activities, is to have the generic policies (Policies P12 and P13) apply unless there is a specific statement required. The benefits of the port are recognised in the Policy P12. The proposed Plan includes specific activity-based provisions where necessary. These include rules relating to cargo equipment, additions and alteration to structures and allowance for new dredging within the navigation protection areas (Rules R173, R174, R175, R202 and R203).

In summary, there is a high risk of challenge to the WRC retaining the operative plan approach as it does not give effect to the national or regional level policy direction. Relying on a separate generic policy stream to recognise the benefits of regionally significant infrastructure is not efficient or effective as there is still a high level of uncertainty which could result in unnecessarily high costs to resource users and the community with no additional environmental benefit.

The preferred approach is to integrate regionally significant infrastructure into the proposed Plan by providing a generic overarching policy structure with more detailed policies where necessary to guide resource users, the community and decision-makers. This will reduce the uncertainty and cost to resources users and the community while still providing for the benefits and managing the adverse environmental effects. Table 6A in the Appendix provides additional detail in respect of the assessment of policies and methods against the criteria of section 32. This approach is considered to be efficient and effective and the most appropriate way to achieve Objective O12.

### 5.3 Protection of regionally significant infrastructure and renewable electricity generation activities

Table 3 shows Objective O13 which seeks to protect regionally significant infrastructure within the coastal marine area from incompatible development alongside and the links to the relevant policies and methods.

**Table 3: Provisions directly relating to the protection of regionally significant infrastructure**

Objective:	O13: The use and ongoing operation of regionally significant infrastructure and renewable electricity generation activities in the coastal marine area is protected from new incompatible use and development occurring under, over, or adjacent to the infrastructure or activity.
Policies:	Policy P14: Incompatible activities adjacent to regionally significant infrastructure and renewable electricity generation activities Policy P135: Navigation protection areas Policy P137: Airport height restriction areas
Rules:	Coastal management general conditions – noise Rules R158 and R159: Airport height restriction areas and navigation protection areas
Method:	N/A

The operative regional plans do not specifically provide protection against new incompatible uses for all regionally significant infrastructure and renewable energy generation activities, only in relation to specific activities such as commercial port and airport activities. This approach is not appropriate given the national and regional level policy direction that has come into force since the development of the operative plans. The risk of not acting is too great.

The preferred approach of the proposed Plan (Option 2, Table A7 in the Appendix) targets the coastal marine area which is the area where a regional plan does control land use and development. The suite of provisions includes a general policy that protects all types of regionally significant infrastructure and renewable energy generation activities from new incompatible use and development. This policy gives effect to the national and regional policy direction at the general scale.

The preferred approach also includes specific policies and rules where the general approach is not sufficient. These provisions have been developed as they control critical aspects of the surrounding environment which are required to enable the efficient operation of the Commercial Port Area and airports. For example the proposed Plan includes separate provisions for the flight approach paths and navigation protection areas. Policies P135 and P137 and Rules R158 and R159 recognise the critical nature of flight approach paths and prohibit the erection or placement of a new structure (excluding navigation aids, cables and pipelines fixed to the seabed) within the flight approach paths of Wellington International Airport and Kapiti Coast Airport and within navigation protection areas unless appropriate approvals have been obtained from the infrastructure provider.

Another example is that the general conditions in the coastal management section of the proposed Plan require that all noise sensitive activities within the Commercial Port Area have sound insulation to a specified level to avoid reverse sensitivity noise effects.

In summary, there is a high risk of challenge to the WRC retaining the operative plan approach as it does not give effect to the higher level policy direction. Relying on a separate generic policy stream to protect regionally significant infrastructure and renewable energy generation activities from new incompatible use and development is not efficient or effective as there are some circumstances such as with the commercial port area and the airport where specific provisions are required. The preferred approach is to provide a generic overarching policy structure with more detailed provisions where necessary to guide resource users, the community and decision-makers. This approach provides clear protection within rules where protection is necessary and provides a policy approach for all regionally significant infrastructure if necessary in a consenting framework. Table 7A in the Appendix provides additional detail in respect of the assessment of policies and methods against the criteria of section 32. This approach is considered to be efficient and effective and the most appropriate way to achieve Objective O13.

## References

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## Appendix

**Table A1: Regionally significant infrastructure and renewable energy generation activities issues summary**

Issue	Significance	Need to be in proposed Plan	Different from operative plan?	Information sources	Appropriate level of information?
Regionally significant infrastructure can have adverse effects on the surrounding environment, including people and communities.	Clear direction from RPS.	Accords with national and regional level policy, and provides clear foundation for development of objectives and policies.	Issue is not recognised in the operative plans.	NZCPS, NPS-REG and RPS provides policy direction	Yes
The use and ongoing operation or functioning of some regionally significant infrastructure can be adversely affected by inappropriate development.	Clear direction from RPS.	Accords with national and regional level policy, and provides clear foundation for development of objectives and policies.	Issue is not recognised in the operative plans.	NZCPS, NPS-REG and RPS provides policy direction	Yes

**Table A2: Assessing the appropriateness of Objective O2**

Objective O2	The importance and contribution of land and water to the social, economic and cultural well-being of the community are recognised.
<b>Relevance</b>	
Directly related to resource management issue?	Yes, this objective addresses issue 1.1.?
Will achieve one or more aspects of the purpose and principles of the RMA?	Yes, the objective is integral to achieving sustainable management of natural and physical resources as required under Part 2 of the RMA.
Relevant to Māori environmental issues? (sections 6(e),6(g),7(aa),8)	Yes.

Relevant to statutory functions or to give effect to another plan or policy (i.e. NPS, RPS)?	Section 5 of the RMA sets out the purpose of the act which enables people and communities to meet the reasonable foreseeable needs of future generations. Section 30 of the RMA outlines the regional council's functions for the purpose of giving effect to the RMA.
<b>Usefulness</b>	
Will effectively guide decision-making?	Yes, the objective guides resource consenting processes and non-statutory methods
Meets sound principles for writing objectives? (specific; state what is to be achieved where and when; relate to the issue; able to be assessed)	This objective is a clear and complete sentence related to an issue. It gives effect to national and regional level policy direction. This objective is not time-bound as it aims to set a policy direction and deliver benefits over time.
Consistent with other objectives?	This objective is considered to be consistent with other objectives. All the objectives have been assessed, and work together to achieve the sustainable management of natural resources in the Wellington Region.
<b>Achievability</b>	
Will it be clear when the objective has been achieved in the future? Is the objective measureable and how would its achievement be measured?	Yes, the achievement of this objective will become clear in the future through the general monitoring and reporting on the effectiveness and efficiency of the proposed Plan.
Is it expected that the objective will be achieved within the life of the proposed Plan or is it an aspirational objective that will be achieved some time in the future?	This objective sets a policy direction for the proposed Plan and will be achieved in the life of the proposed Plan.
Does the Council have the functions, powers, and policy tools to ensure that they can be achieved? Can you describe them?	Yes, within the boundaries of the functions of the regional council. The objective is integral to the purpose of the RMA (section 5). Section 30 of the RMA outlines a regional council functions and section 63 states that the purpose of the regional plan is to assist the regional council to carry out its functions in order to achieve the purpose of the RMA. This objective will be achieved through the policies, rules, and other methods in the proposed Plan.
What other parties can the Council realistically expect to influence to contribute to this outcome?	All resource users
What risks have been identified in respect of outcomes?	This outcome is low risk as it is integral to the purpose of the RMA.

<b>Reasonableness</b>	
Does the objective seek an outcome that would have greater benefits environmentally, economically or socially compared with the costs necessary to achieve it?	Yes – this objective will have greater benefits than the costs necessary to achieve it.
Who is likely to be most affected by achieving the objective and what are the implications for them?	There will need to be a balance between gifting and gaining to achieve this objective, given that some values of water are incompatible with others
<b>Existing objectives</b>	
Are the existing objectives still relevant or useful?	The operative objectives are relevant but not useful as they do not cover all land and water resources due to the separated nature of the existing operative plans.

**Table A3: Assessing the appropriateness of Objective O12**

Objective O12	The social, economic, cultural and environmental benefits of regionally significant infrastructure and renewable energy generation activities are recognised.
<b>Relevance</b>	
Directly related to resource management issue?	Yes, this objective addresses Issue 1 in Section 2 of this report. <i>Regionally significant infrastructure can have adverse effects on the surrounding environment, including people and communities but enables communities to provide for their social, economic and cultural wellbeing.</i> The adverse effects from these activities are addressed by other objectives in the proposed Plan.
Will achieve one or more aspects of the purpose and principles of the RMA?	Yes, Part 2, section 5. This objective recognises the need to provide for the social, economic, cultural and environmental wellbeing of people and communities by recognising the benefits of regionally significant infrastructure and renewable energy generation facilities.
Relevant to Māori environmental issues? (sections 6(e),6(g),7(aa),8)	Yes, provides for cultural well-being

Relevant to statutory functions or to give effect to another plan or policy (e.g. section 30, and any relevant NPS, NES, NZCPS, RPS)?	<p>This objective is relevant to the following statutory functions of a regional council under the RMA:</p> <p>Section 30 (1)(b) – effects of use and development which are of regional significance, and</p> <p>Section 30(1)(gb) – strategic integration of infrastructure with land use</p> <p>This objective will help give effect to Objective 6 and Policies 6, 9, and 10 of the NZCPS. These provisions recognise the importance of regionally significant infrastructure and renewable electricity generation activities.</p> <p>This objective will give effect to the NPS-REG which requires a regional plan to recognise and provide for the national significance of renewable electricity generation activities.</p> <p>This objective will give effect to the NPS-ET which requires a regional plan to recognise and provide for the national, regional and local benefits of electricity transmission.</p> <p>This objective will give effect to Policy 7 of the RPS which requires the regional plan to recognise the benefits of regionally significant infrastructure and energy generation from renewable energy resources.</p>
<b>Usefulness</b>	
Will effectively guide decision-making?	This objective will guide the processing of resource consent applications for regionally significant infrastructure and renewable electricity generation activities.
Meets sound principles for writing objectives?	<p>This objective is a clear and complete sentence related to an issue. It gives effect to national and regional level policy direction.</p> <p>This objective is not time-bound as it aims to set a policy direction and deliver benefits over time.</p>
Consistent with other objectives?	This objective is considered to be consistent with other objectives. All the objectives have been assessed, and work together to achieve the sustainable management of natural resources in the Wellington Region.
<b>Achievability</b>	
Will it be clear when the objective has been achieved in the future? Is the objective measurable and how would its achievement be measured?	<p>Yes, the achievement of this objective will become clear in the future through the general monitoring / reporting on the effectiveness and efficiency of this plan.</p> <p>This objective is most relevant in resource consent decision making for regionally significant infrastructure and/or renewable energy generation activity applications.</p>
Is it expected that the objective will be achieved within the life of the proposed Plan or is it an aspirational objective that will be achieved some time in the future?	This objective sets a policy direction for the proposed Plan and will be achieved in the life of the proposed Plan.

Does the council have the powers, and policy tools to ensure that they can be achieved? Can you describe them?	Yes, this objective sets a policy direction that applies to all resource consent applications (applied for under section 9 – 15 of the RMA) associated with regionally significant infrastructure and/or renewable energy generation activities. This objective will be achieved through the policies, rules, and other methods in the proposed Plan.
What other parties can the Council realistically expect to influence to contribute to this outcome?	Territorial authorities also contribute to this outcome.
What risks have been identified in respect of outcomes?	The risk to the development, upgrade, maintenance and operation of regionally significant infrastructure and renewable electricity generation activities will be reduced through the achievement of this objective.
<b>Reasonableness</b>	
Does the objective seek an outcome that would have greater benefits environmentally, economically or socially compared with the costs necessary to achieve it?	Yes – this objective will have a greater benefit than cost to achieve. This objective recognises the benefits of regionally significant infrastructure and renewable energy generation activities whilst other provisions in the proposed Plan manage the adverse effects associated with regionally significant infrastructure and renewable energy generation activities.
Who is likely to be most affected by achieving the objective and what are the implications for them?	Agencies that undertake regionally significant infrastructure and renewable energy generation activities will receive the benefit of having objectives and policies that recognise the benefits of these activities and the wider community in turn benefits from the infrastructure.
<b>Existing objectives</b>	
Are the existing objectives still relevant or useful?	The operative objectives are not specific enough as they do not specifically recognise the benefits of regionally significant infrastructure and renewable energy generation activities.

**Table A4: Assessing the appropriateness of Objective O13**

Objective O13	The use and ongoing operation of regionally significant infrastructure and renewable energy generation activities in the coastal marine area is protected from new incompatible use and development occurring under, over, or adjacent to the infrastructure or activity
<b>Relevance</b>	
Directly related to resource management issue?	Yes, this objective addresses Issue 2 in Section 2 of this report. <i>The use and ongoing operation or functioning of some regionally significant infrastructure can be adversely affected by inappropriate development.</i>

Will achieve one or more aspects of the purpose and principles of the RMA?	Yes, Part 2, section 5. This objective recognises the need to provide for the social, economic, cultural and environmental wellbeing of people and communities by protecting regionally significant infrastructure and renewable energy generation activities from incompatible use and development.
Relevant to Māori environmental issues? (sections 6(e),6(g),7(aa),8)	Yes, provides for cultural well being
Relevant to statutory functions or to give effect to another plan or policy (e.g. section 30, and any relevant NPS, NES, NZCPS, RPS)?	This objective is relevant to the following statutory functions of a regional council under the RMA: Section 30 (1)(b) – effects of use and development which are of regional significance, and Section 30(1)(gb) – strategic integration of infrastructure with land use This objective will help give effect to the NZCPS, particularly Objective 6 and Policies 6, 9, and 10. These provisions recognise the importance of regionally significant infrastructure and renewable electricity generation activities. This objective will give effect to the NPS-REG which requires a regional plan to manage activities to avoid reverse sensitivity effects on consent and on existing renewable electricity generation activities. This objective will give effect to the NPS-ET, particularly Policies 10 and 11. This objective will give effect to Policy 8 of the RPS which requires the regional plan to protect regionally significant infrastructure from adjacent new incompatible development.
<b>Usefulness</b>	
Will effectively guide decision-making?	This objective provides a clear statement of direction and will guide the processing of resource consent applications for new development adjacent to regionally significant infrastructure and renewable energy generation activities within the coastal marine area.
Meets sound principles for writing objectives? (specific; state what is to be achieved where and when; relate to the issue; able to be assessed)	This objective is a clear and complete sentence related to an issue and the function and responsibility of the regional council under the RMA and gives effect to various other higher level national and regional level policy statements. This objective is not time-bound as it aims to set a policy direction and deliver benefits over time.
Consistent with other objectives?	This objective is considered to be consistent with other objectives. All the objectives have been assessed, and work together to achieve the sustainable management of natural resources in the Wellington Region.
<b>Achievability</b>	
Will it be clear when the objective has been achieved in the future? Is the objective measureable and how would its achievement be measured?	Yes, the achievement of this objective will become clear in the future through the general monitoring and reporting on the effectiveness and efficiency of the proposed Plan. This objective is most relevant in resource consent decision-making for new development adjacent to regionally significant infrastructure and renewable energy generation activities.

Is it expected that the objective will be achieved within the life of the proposed Plan or is it an aspirational objective that will be achieved some time in the future?	This objective sets a policy direction for the proposed Plan and will be achieved in the life of the proposed Plan.
Does the council have the powers, and policy tools to ensure that they can be achieved? Can you describe them?	Yes, this objective sets a policy direction that applies to all resource consent applications (applied for under section 9 – 15 of the RMA) for activities adjacent to regionally significant infrastructure and/or renewable energy generation activities. This objective will be achieved through the policies, rules, and other methods in the proposed Plan.
What other parties can the Council realistically expect to influence to contribute to this outcome?	Territorial authorities also contribute to this outcome as district plans also have to give effect to the NPS-REG, NPS-ET and RPS.
What risks have been identified in respect of outcomes?	The risk to the development, upgrade, maintenance and operation of regionally significant infrastructure and renewable energy generation activities will be reduced through the achievement of this objective.
<b>Reasonableness</b>	
Does the objective seek an outcome that would have greater benefits environmentally, economically or socially compared with the costs necessary to achieve it?	Yes – the proposed Plan as a whole seeks this in respect of regionally significant infrastructure and renewable energy generation activities and will have greater benefits than the costs necessary to achieve it. This objective protects regionally significant infrastructure and renewable energy generation activities within the coastal marine area from incompatible use alongside.
Who is likely to be most affected by achieving the objective and what are the implications for them?	Agencies that construct and operate regionally significant infrastructure and renewable energy generation activities will receive increased certainty that existing infrastructure will be protected from the potential reverse sensitivity effects associated with the location of sensitive activities or land uses locating alongside.
<b>Existing objectives</b>	
Are the existing objectives still relevant or useful?	The operative objectives are not specific enough to address this natural resource management issue

**Table A5: Assessment of the policies, rules and other methods – Objective 2: Importance of land and water**

		<b>Option 1 – Status quo</b>	<b>Option 2 – General overall approach with specific policy recognition where appropriate (improved status quo) (Preferred option)</b>	<b>Option 3 – Stay silent at the policy level in the proposed Plan and rely on section 5 of the RMA</b>
Costs (of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions)	Council	Small, if not non-existent cost to the Council from the implementation of these provisions. Inconsistent message across the operative plans.	Small, if not non-existent cost to the Council from the implementation of these provisions.	Small, if not non-existent cost to the Council from the implementation of these provisions.
	Resource user (consent applicant or permitted use)	Small, if not non-existent cost to resource users from the implementation of these provisions. Inconsistent message across the operative plans.	Resource consent application costs potentially reduced as there are policies that recognise the benefits. Resource user would still need to justify and quantify the benefit on a case-by-case basis but the existence of these benefits is stated in policy.	Resource consent application costs potentially greater as there are no policies that recognise the benefits. The resource user would have to rely on the RMA. Resource user would still need to justify and quantify the benefit on a case-by-case basis but the existence of these benefits is stated in policy.
	Community costs (environmental, social, economic, cultural)	Small, if not non-existent cost to the community from the implementation of these provisions. Inconsistent message across the operative plans.	Less uncertainty as the proposed Plan recognises the benefits. However, there is the possibility that the community does not agree with the recognition of the benefits.	Cost to being involved in a resource consent application potentially greater as there are no policies that recognise the benefits. The community would have to rely on the RMA.

		<b>Option 1 – Status quo</b>	<b>Option 2 – General overall approach with specific policy recognition where appropriate (improved status quo) (Preferred option)</b>	<b>Option 3 – Stay silent at the policy level in the proposed Plan and rely on section 5 of the RMA</b>
Benefits (of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions)	Council	Small, if not non-existent benefit to the Council from these provisions.	Lower risk of challenge as this option clearly articulates that use and development of land and water resources has benefits. Sets a clear consistent policy direction for decision-makers.	Small, if not non-existent benefit to the Council from these provisions. Does not try to reinterpret the RMA.
	Resource user (consent applicant/licensed operator or permitted use)	Small, benefit to the resource users from familiarity with the existing provisions.	Increases certainty by setting a clear and consistent policy direction. Potentially reduced resource consent application costs in respect of justifying the proposal. Highlights areas which need specific policy direction	Does not try to reinterpret the RMA.
	Community benefits (environmental, social, economic, cultural)	Small, benefit to the community from familiarity with the existing provisions.	Increase certainty by setting a clear and consistent policy direction. Potentially reduced resource consent application costs in respect of justifying the proposal. Highlights areas which need specific policy direction	Does not try to reinterpret the RMA.
Efficiency (costs vs benefits) and effectiveness (will the provisions achieve the objective)		The operative plan provisions are outdated and inconsistent. Some of the operative plans articulate the purpose of the RMA but others do not. The existing objectives unchanged are not efficient or effective.	Option 1 is an updated and consistent version of the status quo. The benefits of this option outweigh the costs and it will achieve the objective.	When compared to Option 2 the costs of this objective are greater and the benefits are less. Even though it may still achieve the objective. It is therefore not the most efficient or effective.

		<b>Option 1 – Status quo</b>	<b>Option 2 – General overall approach with specific policy recognition where appropriate (improved status quo) (Preferred option)</b>	<b>Option 3 – Stay silent at the policy level in the proposed Plan and rely on section 5 of the RMA</b>
Risks of acting or not acting (If there is uncertain or insufficient information)		Risk of not acting is high given the inconsistency within the operative plan provisions.	Risk of acting is low as the policy approach is consistent with the purpose of the RMA. Risk of not acting is medium as Option 2 develops specific activity based policies for some activities are considered to require specific policy direction. There is sufficient information to justify this option.	Risk of acting is low as the policy approach is consistent with the purpose of the RMA. Risk of not acting is medium as Option 2 develops specific activity based policies for some activities are considered to require specific policy direction. There is sufficient information to justify this option
Appropriateness (If it is efficient and effective then it must be appropriate)		This option is not appropriate as it is not efficient or effective and there is a high risk in not acting given the inconsistency within the operative plan provisions.	This option is the most effective and efficient and therefore appropriate.	This option is not the most effective and efficient and therefore is not appropriate.
Conclusions		Option 1 is not considered to be the most effective or efficient means of achieving the proposed objectives or meeting the purpose of the RMA.	Option 2 is considered to be the most effective and efficient means of achieving the proposed objectives or meeting the purpose of the RMA.	Option 3 is not considered to be the most effective or efficient means of achieving the proposed objectives or meeting the purpose of the RMA.

**Table A6: Assessment of the policies, rules and other methods – Benefits of regionally significant infrastructure**

		<b>Option 1 – Status quo – no specific mention of regionally significant infrastructure or renewable energy generation activities</b>	<b>Option 2 – Recognise the benefits of regionally significant infrastructure and renewable energy generation activities in a separate policy stream</b>	<b>Option 3 – Identify and recognise the benefits through policies and rules as an integrated package within the proposed Plan (Preferred option)</b>
Costs (of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions)	Council	Risk of challenge as the operative provisions do not give effect to the RPS nor do they clearly give effect NPS-REG and NPS-ET. Small, if not non-existent cost to the Council from the implementation of these provisions. Greater uncertainty for resource consent applicants in respect of decisions	Small, if not non-existent cost to the Council from the implementation of these provisions. Reduced uncertainty as a clear set of provisions that recognise the benefits. However, there is still some uncertainty as it is a separate policy stream that is not integrated into the rest of the proposed Plan.	Small, if not non-existent cost to the Council from the implementation of these provisions.
	Resource user (consent applicant or permitted use)	Greater uncertainty for resource consent applicants in respect of decisions. Potentially greater resource consent application costs associated with justifying that these activities have benefits that should also be considered as part of the resource consent decision making process.	Reduced uncertainty as a clear set of provisions that recognise the benefits. However, there is still some uncertainty as it is a separate policy stream that is not integrated into the rest of the plan. Resource consent application costs potentially reduced as there are policies that recognise the benefits. Resource user would still need to justify and quantify the benefit on a case by case basis but the existence of these benefits is stated in policy.	Further reduced uncertainty as a clear set of provisions that recognise the benefits and integrates these throughout the proposed Plan. Resource consent application costs potentially reduced as there are specific policies and integrated policies and rules that recognise the benefits. Resource user would still need to justify and quantify the benefit on a case by case basis but the existence of these benefits is stated in policy and integrated into the appropriate activity based policies.
	Community costs (environmental, social, economic, cultural)	Greater uncertainty for resource consent decisions.	Less uncertainty as the proposed Plan recognises the benefits. However, there is the possibility that the community do not agree with the recognition of the benefits.	Less uncertainty as the proposed Plan recognises the benefits. However, there is the possibility that the community do not agree with the recognition of the benefits.

		<b>Option 1 – Status quo – no specific mention of regionally significant infrastructure or renewable energy generation activities</b>	<b>Option 2 – Recognise the benefits of regionally significant infrastructure and renewable energy generation activities in a separate policy stream</b>	<b>Option 3 – Identify and recognise the benefits through policies and rules as an integrated package within the proposed Plan (Preferred option)</b>
Benefits (of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions)	Council	Small, if not non-existent benefit to the Council from these provisions.	No risk of challenge as this option clearly gives effect to higher level policy direction. Sets a clear policy direction for decision makers.	No risk of challenge as this option clearly gives effect to higher level policy direction. Sets a clear and integrated framework to for decision-makers to consider resource consent applications.
	Resource user (consent applicant/licensed operator or permitted use)	Small, benefit to the resource users from familiarity with the existing provisions. Potential benefit gained from uncertainty within the current provisions.	Increase certainty by setting a clear policy direction. Potentially reduced resource consent application costs in respect of justifying the proposal.	Increase certainty by setting a clear policy direction and goes one step further than Option 2 by integrating this policy direction into the appropriate activity based policies. Potentially reduced resource consent application costs in respect of justifying the proposal.
	Community benefits (environmental, social, economic, cultural)	Small, if not non-existent benefit to the community from these provisions. Potential benefit gained from uncertainty within the current provisions.	Increase certainty by setting a clear policy direction.	Increase certainty by setting a clear policy direction and going one step further than Option 2 by integrating this policy direction into the appropriate activity based policies.
Efficiency (costs vs benefits) and effectiveness (will the provisions achieve the objective)		The operative plan provisions will not achieve the proposed plan objective and therefore it is not considered to be efficient or effective.	Option 2 proposes a separate general policy stream to achieve the objectives of the proposed Plan. Option 2 may achieve the objectives of the proposed Plan and the benefits are likely to outweigh the costs. However, this option is less efficient and effective than Option 3.	Option 3 proposes a integrated policy approach with generic policies and activity specific policies where appropriate. This option clearly achieves the objectives of the proposed Plan and the benefits are likely to outweigh the costs. This option is considered to be more efficient and effective than Option 2.

		<b>Option 1 – Status quo – no specific mention of regionally significant infrastructure or renewable energy generation activities</b>	<b>Option 2 – Recognise the benefits of regionally significant infrastructure and renewable energy generation activities in a separate policy stream</b>	<b>Option 3 – Identify and recognise the benefits through policies and rules as an integrated package within the proposed Plan (Preferred option)</b>
Risks of acting or not acting (If there is uncertain or insufficient information)		There is a risk of legal challenge as it does not give effect to national and regional level policy direction.	Low risk of legal challenge as gives effect to national and regional level policy direction. There is sufficient information to justify the inclusion of having a policy stream that recognises the benefits of regionally significant infrastructure and renewable energy generation activities. There is a risk of uncertainty having a separate policy stream and not integrating the benefits within the plan.	Low risk of legal challenge as gives effect to national and regional level policy direction. There is sufficient information to justify the inclusion of having a policy stream that recognises the benefits of regionally significant infrastructure and renewable energy generation activities and integrates the approach into activity specific policies.
Appropriateness [If it is efficient and effective then it must be appropriate]		This option is not appropriate as it does not achieve the objective nor does it give full effect to national and regional level policy direction.	This option maybe appropriate as it is effective and efficient but it is not the most effective and efficient as Option 3.	This option is appropriate as it is the most effective and efficient means of achieving the objective and gives effect to higher level national and regional level policy direction.
Conclusions		Option 1 is not considered to be the most effective or efficient means of achieving the proposed objectives or meeting the purpose of the RMA.	Option 2 is not considered to be the most effective or efficient means of achieving the proposed objectives or meeting the purpose of the RMA.	Option 3 is considered to be the most effective or efficient means of achieving the proposed objectives or meeting the purpose of the RMA.

**Table A7: Assessment of the policies, rules and other methods – Protection of regionally significant infrastructure**

		<b>Option 1 – Status quo</b>	<b>Option 2 – Amend provisions to give effect to national and regional level policy direction (Preferred option)</b>
Costs (of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions)	Council	Small, if not non-existent cost to the Council from the implementation of these provisions.  Risk of challenge as the operative provisions do not give effect to the RPS nor do they clearly give effect NPS-REG and NPS-ET.	The implementation cost to Council is not expected to be substantively different from Option 1.
	Resource user (consent applicant or permitted use)	Greater uncertainty for both regionally significant infrastructure and adjacent land uses as there is no clear statement about the protection of regionally significant infrastructure or renewable energy generation from incompatible use and development.  Potentially greater resource consent application costs for both regionally significant infrastructure and adjacent land users arising from a conflict between parties over the use of adjacent land due to no clear policy direction.	Cost of restricting the use of land adjacent to regionally significant infrastructure projects.  Small, if not non-existent cost to regionally significant infrastructure activities from these provisions.
	Community costs (environmental, social, economic, cultural)	Greater uncertainty for both regionally significant infrastructure and adjacent land uses as there is no clear statement about the protection of regionally significant infrastructure or renewable energy generation from incompatible use and development.	Small, if not non-existent cost to the community from these provisions. However, there is the possibility that the community will not agree with the policy direction.
Benefits (of the environmental, economic,	Council	Small, if not non-existent benefit to the Council from these provisions.	No risk of challenge as this option clearly gives effect to higher level policy direction.  Sets a clear and integrated framework to for decision-makers to consider resource consent applications.

		<b>Option 1 – Status quo</b>	<b>Option 2 – Amend provisions to give effect to national and regional level policy direction (Preferred option)</b>
social, and cultural effects that are anticipated from the implementation of the provisions)	Resource user (consent applicant/licensed operator or permitted use)	Small, benefit to the resource users from familiarity with the existing provisions. Potential benefit gained from uncertainty within the current provisions.	Large benefit to regionally significant infrastructure activities as they are protected from incompatible land uses at both the objective and policy level. Resource users could potentially experience reduced resource consenting costs as their will be a clear policy direction. Resource users would still need to justify and quantify the effect on a case by case basis but the existence of these effects and the policy approach is clearly stated in the proposed Plan.
	Community benefits (environmental, social, economic, cultural)	Small, if not non-existent benefit to the community from these provisions. Potential benefit gained from uncertainty within the current provisions.	Clear policy direction in respect of reverse sensitivity effects associated with regionally significant infrastructure and renewable electricity generation activities.
Efficiency (costs vs benefits) and Effectiveness (will the provisions achieve the objective)		The operative plan provisions will not achieve the proposed Plan objective and therefore they are not considered to be efficient or effective.	This policy approach provides a general policy position to achieve the objective and then specific activity-based policy directions where considered necessary. This approach is considered to be efficient and effective.
Risks of acting or not acting (If there is uncertain or insufficient information)		There is a risk of legal challenge as it does not give effect to national and regional level policy direction.	Low risk of legal challenge as gives effect to national and regional level policy direction. There is sufficient information to justify the inclusion of having a policy stream that protects regionally significant infrastructure from incompatible use and development.
Appropriateness (If it is efficient and effective then it must be appropriate)		This option is not appropriate as it does not achieve the objective nor does it give full effect to higher level national and regional level policy direction.	This option is appropriate as it achieves the objective and gives effect to higher level national and regional level policy direction.
Conclusions		Option 1 is not considered to be the most effective or efficient means of achieving the proposed objectives or meeting the purpose of the RMA.	Option 2 is considered to be the most effective or efficient means of achieving the proposed objectives or meeting the purpose of the RMA.

The Greater Wellington Regional Council's purpose is to enrich life in the Wellington Region by building resilient, connected and prosperous communities, protecting and enhancing our natural assets, and inspiring pride in what makes us unique

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