



# Further Submission for the Proposed District Plan

Clause 8 of Schedule 1, Resource Management Act 1991

## Privacy Statement

Your further submission must include your name, and an address for service (preferably email, but you can use a postal address). All information you include in this further submission, including your name and address for service, will be provided to other submitters and published on Hutt City Council's website. Paper copies may also be made available. Hutt City Council is required to collect and publish this information to carry out its functions under the Resource Management Act 1991 and to enable others to take part in the district plan process. The Council, other submitters, and the Environment Court may need to contact you during this process.

If your further submission does not include your name and an address for service, it will be rejected.

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To: Chief Executive, Hutt City Council

1. **This is a further submission from:**

Full Name	<small>Last</small> <input type="text"/> <small>First</small> <input type="text"/>	
Company/Organisation	<input type="text"/>	
Contact if different	<input type="text"/>	
Address	<small>Number</small> <input type="text"/> <small>Street</small> <input type="text"/>	
	<small>Suburb</small> <input type="text"/>	
	<small>City</small> <input type="text"/>	<small>Postcode</small> <input type="text"/>
Address for Service if different	<small>Postal Address</small> <input type="text"/>	
Phone	<small>Home</small> <input type="text"/>	<small>Work</small> <input type="text"/>
	<small>Mobile</small> <input type="text"/>	
Email	<input type="text"/>	

2. This is a **further submission** in support of or opposition to a submission on the Proposed Lower Hutt District Plan.

3. I consider that, under Clause 8 of the First Schedule of the Resource Management Act, I may make a further submission because:

I represent a relevant aspect of the public interest

*Please give details:*

I have an interest in the Proposed Plan Change that is greater than the interest of the general public

*Please give details:*

I represent Hutt City Council

4. I support or oppose the submission of:

*Name and address of original submitter and submission number of original submission:*

*(Please use additional pages if you wish)*

5. The particular parts of the submission I support or oppose are:

*Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal*

*(Please use additional pages if you wish)*



6. The reasons for my support or opposition are:

Please give reasons:

(Please use additional pages if you wish)

7. I seek that the whole or part [describe part] of the submission be allowed or disallowed:

Please give precise details:

(Please use additional pages if you wish)

8. I  wish  do not wish to be heard in support of my submission

(Please tick one)

9. If others make a similar submission,

I  will  will not consider presenting a joint case with them at the hearing

(Please tick one)

Signature of submitter

(or person authorised to sign on behalf of submitter)

Date

A signature is not required if you make your submission by electronic means

Original submission points					Transpower Further Submission Points		
Submission Ref	Plan Provision	Relief sought	Reasoning	Relief sought	Transpower Position	The reasons for Transpower's support or opposition	Relief Transpower seeks
<b>Connexa, Chorus, Forty South and Spark</b>							
Connexa, Chorus, FortySouth and Spark 311.13	Definitions – Add Maintenance and repair	Oppose (requesting new provision)	Supports interpretation of "upgrading" the definition of which states is not maintenance and repair. Suggested definition is from Wellington PDP, which will support regional consistency.	Retain the definition of upgrading as notified, and Add a definition of <u>Maintenance and repair</u> as follows:  "means any work or activity necessary to continue the operation or functioning of existing infrastructure. It does not include upgrading, but does include replacement of an existing structure with a new structure of identical dimensions."	Neutral	Transpower is largely neutral on the provision of a new definition for 'maintenance and repair' to be provided in the PDP but seeks that any changes ensure a clear framework that avoids duplication of provisions.  Transpower notes that the NESETA provides the regulatory framework for the maintenance and repair of the National Grid.	No specific relief sought
<b>Ministry of Education</b>							
Ministry of Education 399.7	New Definition – Additional Infrastructure	Oppose (requesting new provision)	Is a defined term in the National Policy Statement on Urban Development 2020 (NPSUD) Will provide clarity for the plan reader as to what types of activities are considered under this definition.  Supports relief requested in submission points 399.12, 399.13 and 399.19	Add definition of "Additional infrastructure":  "means: a. <u>public open space</u> b. <u>community infrastructure as defined in section 197 of the Local Government Act 2002</u> c. <u>land transport (as defined in the Land Transport Management Act 2003) that is not controlled by local authorities</u> d. <u>social infrastructure, such as schools and healthcare facilities</u> e. <u>a network operated for the purpose of telecommunications (as defined in section 5 of the Telecommunications Act 2001)</u> f. <u>a network operated for the purpose of transmitting or distributing electricity or gas.</u> "	Neutral	Transpower is not opposed in principle to the provision of a new definition to be provided in the PDP for 'additional infrastructure' but is not clear what purpose the definition will serve.  However, Transpower's position is subject to how the term is intended to be applied and used in the plan, noting that the NPSET and NESETA provide for National Grid infrastructure and do not include the sought term.	No specific relief sought
<b>Director-general of Conservation</b>							
Director-general of Conservation 405.8b	New Definition – Vegetation Clearance	Oppose (requesting new provision)	A definition of "vegetation removal" or "vegetation clearance" is necessary. Without a definition, there may be doubt over the meaning of these rules, and inconsistency in their implementation. (Refer to original submission for full reasons.)	Add a definition for "vegetation clearance" as follows:  "The clearance or destruction of woody vegetation (exotic or native) by <u>mechanical or chemical means, including felling vegetation, spraying of vegetation by hand or aerial means, hand clearance, and the burning of vegetation. Vegetation clearance does not include:</u> • <u>any vegetation clearance, tree removal, or trimming of vegetation associated with the Electricity (Hazards from Trees) Regulations 2003.</u> • <u>any vegetation clearance or vegetation disturbance covered by the Resource Management (National Environmental Standards for Commercial Forestry) Regulations 2017.</u> • <u>any vegetation clearance associated with the repair and maintenance of existing roads and tracks,</u> • <u>the removal of a standalone shrub or tree, or</u> • <u>the removal of a standalone clump of trees or shrubs no larger than 20m2."</u>	Support in part	Transpower is not opposed to the principle of the proposed definition for 'vegetation clearance'.  However, Transpower's position is subject to how the term is intended to be applied to the maintenance and repair of existing National Grid assets that may require vegetation clearance.  Given the necessity for works associated with the National Grid, Transpower would support an exemption for 'any vegetation clearance, tree removal, or trimming of vegetation associated with existing National Grid asset regulated by the NESETA.'	Should the definition be inserted, Transpower would support amendment to include reference to 'any <u>vegetation clearance, tree removal, or trimming of vegetation associated with existing National Grid asset regulated by the NESETA.</u> '

Director-general of Conservation 405.14	INF-P8 (Upgrading and developing the National Grid)	Support in part	<p>Supports text policy that would require “avoiding adverse effects” on the identified values of ONFs and Outstanding Coastal Natural Character. Contains no specific protection for indigenous biodiversity, including in the coastal environment</p> <p><i>Submission:</i></p> <ul style="list-style-type: none"> <li>• Both within and outside the coastal environment, RMA sections 6b and 6c apply in relation to protection of outstanding natural features and landscapes, and of areas of significant indigenous vegetation and significant habitats of indigenous fauna.</li> <li>• Policies 11, 13 and 15 of the NZCPS are relevant to the management of effects of all activities on indigenous biodiversity, natural character, and natural features and landscapes in the coastal environment.</li> <li>• Policy 8 of the NPS Electricity Transmission applies to development and upgrade of the National Grid in ONLs and “areas of high natural character” (areas of outstanding natural character, and indigenous biodiversity, are not mentioned in this NPS).</li> </ul> <p>The text in INF-P8 that would require “avoiding adverse effects” on the identified values of ONFs and Outstanding Coastal Natural Character (CNC) areas is supported.</p> <p>However, the policy should provide a better balance in giving effect to both the NZCPS and the NPSET. In particular, it contains no specific protection for indigenous biodiversity, including in the coastal environment.</p>	Seeks that the policy is amended to achieve a better balance in giving effect to the RMA, NZCPS and NPSET, in particular by strengthening the policy in relation to the management of effects on indigenous biodiversity, and the management of effects on natural character and landscape values in the coastal environment	Oppose	<p>As outlined in Transpower’s submission, Transpower supports the provision of a specific National Grid policy. The NPSET recognises the national significance of the National Grid and provides a suite of specific policies which are required to be given effect to in the district plan.</p> <p>Transpower notes that the specific wording of the relief sought has not been provided and therefore Transpower is not able to fully evaluate the relief sought. However, Transpower would oppose an avoid policy directive on the basis that outright avoid policies do not reconcile the policies across the national direction.</p> <p>Transpower supports the approach outlined and requested in its original submission, and therefore opposes any contrary relief.</p>	The whole of the submission point be disallowed
Director-general of Conservation 405.17	INF-P – New Policy	Oppose (requesting new provision)	The policy is required to give effect to the RMA, NPSIB and RPS	Add a new policy to the infrastructure section to manage the effects of upgrading and developing infrastructure on indigenous biodiversity.	Oppose	<p>Transpower notes that the wording of the sought provision has not been provided, and as such, it is not able to fully evaluate the relief sought.</p> <p>Transpower supports the approach outlined and requested in its submission.</p>	The whole of the submission point be disallowed
Director-general of Conservation 405.18	Rules – General	Oppose in part	<p>The proposed activity statuses and performance standards for several different types of new infrastructure do not provide for effects on biodiversity to be assessed and managed via the resource consent process. (Refer to original submission for full reasons)</p> <p><i>Submission:</i></p> <p>The D-G notes that the proposed activity statuses and performance standards for several different types of new infrastructure do not provide for effects on biodiversity to be assessed and managed via the resource consent process, unless these are proposed within residential zones, the Natural Open Space Zone, outstanding natural features or landscapes, or coastal natural character overlays (these are the areas within which indigenous vegetation clearance rules apply).</p> <p>Under the proposed rules, effects on biodiversity would not be considered for (for example) new railways or roads, new substations, or new electricity distribution lines, unless within one of the zones/overlays identified above, despite the fact that these types of infrastructure have the potential to adversely affect biodiversity values outside these areas (for example in rural or open space zones).</p> <p>Therefore, the proposed provisions do not give effect to the RMA or NPSIB.</p>	Seeks that activity status rules and performance standards are amended as necessary, to ensure that resource consent is required, and effects on biodiversity are appropriately managed, for infrastructure activities that are of a scale or location that creates the potential for this type of effect.	Oppose	<p>Transpower notes that the wording of the rule has not been provided. As such, no comment can be made towards the drafting of the rule.</p> <p>Transpower supports the approach outlined and requested in its submission, and therefore opposes any contrary relief.</p>	The whole of the submission point be disallowed
Director-general of Conservation 405.19	Rules – General	Oppose in part	<p>The infrastructure chapter does not contain any specific controls for buildings, structures, earthworks and vegetation clearance in coastal and riparian margins. (Refer to original submission for full reasons)</p> <p><i>Submission:</i></p> <p>The D-G notes that infrastructure activities are exempt from provisions in the</p>	Seeks that the rules are amended to appropriately manage buildings, structures, earthworks and indigenous vegetation clearance associated with infrastructure within coastal and riparian margins.	Oppose	<p>Transpower notes that the wording of the rule has not been provided. As such, no comment can be made towards the drafting of the rule.</p> <p>Transpower supports the approach outlined and requested in its submission, and therefore</p>	The whole of the submission point be disallowed

			<p><i>Natural Character, Natural Landscapes and Features, Coastal Environment and Earthworks chapters, and that these chapters contain controls on development (including buildings, structure, earthworks and indigenous vegetation clearance) occurring within ONFLs, coastal natural character (CNC) overlays, and coastal and riparian margins.</i></p> <p><i>In the case of ONFLs and CNC overlays, proposed infrastructure rules appear to have been designed to fill the gaps left by these exemptions, because they contain specific controls on buildings, structures, earthworks and indigenous vegetation clearance associated with infrastructure, for these areas.</i></p> <p><i>However, this has not been done in the case of coastal and riparian margins; the infrastructure chapter does not contain any specific controls for buildings, structures, earthworks and vegetation clearance in these areas. It appears that this may have been unintentional, given the proposed wording of related policy INF-P10.</i></p>			opposes any contrary relief.	
Director-general of Conservation 405.20	INF - Infrastructure Intro to Rules	Oppose in part	<p>To align with relief requested elsewhere in submission - the addition of provisions managing indigenous vegetation clearance in other zones. (Refer to original submission for full reasons)</p> <p><i>Submission:</i></p> <p><i>At the beginning of the INF rules section, the Plan states:</i></p> <p><i>Operating, maintaining, repairing, upgrading, developing and decommissioning of infrastructure is excluded from all provisions in area-specific and other district-wide chapter, except for:</i></p> <p>...</p> <p><i>c. Provisions for the removal of indigenous vegetation in the Natural Open Space Zone and residential zones (located in the Ecosystems and Indigenous Biodiversity chapter)</i></p> <p><i>As set out below, the D-G requests the addition of provisions managing indigenous vegetation clearance in other zones, including the rural and open space zones, in order to give effect to relevant higher order documents and to implement the Act's requirements. These new provisions should be cross-referenced from the INF section.</i></p>	<p>Amend statement at beginning of INF rules section as follows:</p> <p>"...</p> <p>Operating, maintaining, repairing, upgrading, developing and decommissioning of infrastructure is excluded from all provisions in area-specific and other district-wide chapter, except for:</p> <p>...</p> <p>c. Provisions for the removal of indigenous vegetation in the Natural Open Space Zone and residential zones (located in the Ecosystems and Indigenous Biodiversity chapter) ..."</p>	Oppose	<p>Transpower does not agree with the relief sought.</p> <p>Transpower supports the approach outlined and requested in its submission, and therefore opposes any contrary relief.</p>	The whole of the submission point be disallowed
Director-general of Conservation 405.28	ECO-O1 (Ecosystems and indigenous biodiversity)	Amend	To give effect to the objective of the NPSIB.	<p>Amend objective as follows:</p> <p>"Indigenous biodiversity in Lower Hutt is maintained, and where practicable, restored or enhanced <u>so that there is at least no overall loss in indigenous biodiversity.</u>"</p>	Oppose	Transpower opposes the provision to prevent no overall loss of indigenous vegetation within the objective.	The whole of the submission point be disallowed
Director-general of Conservation 405.32a	ECO-R2 (Indigenous vegetation removal with respect to all zones other than Residential and Natural Open Space zones)	Oppose	Indigenous vegetation clearance is unconstrained in all zones other than residential zones and the Natural Open Space Zone. This leaves large areas of indigenous vegetation unprotected, including in rural zones and the Open Space Zone.	Amend ECO-R2 to manage indigenous vegetation clearance in other zones that contain indigenous vegetation, including in particular the rural zones and the Open Space Zone.	Oppose	<p>Transpower opposes the relief sought, noting that the wording of the proposed provision has not been made available. In the absence of this detail, Transpower is unable to undertake a comprehensive assessment of the potential implications of the rule.</p> <p>As per Transpower's submission, Transpower supports the permitted activity status within ECO-R2.1.</p> <p>Within the residential zones and Natural Open Space zones, Transpower has existing National Grid assets. Vegetation around and underneath the existing assets is required to be trimmed, cleared or modified to ensure the ongoing operation of the existing assets. While Transpower accepts the development of any new National Grid assets would be subject to rules, it seeks a permitted activity status to ensure the operation, maintenance, safety or</p>	The whole of the submission point be disallowed

						upgrade of existing National Grid assets	
Director-general of Conservation 405.32b	ECO-R2 (Indigenous vegetation removal with respect to all zones other than Residential and Natural Open Space zones)	Oppose	Given there are no SNAs or equivalents in the Proposed Plan, indigenous vegetation clearance rules become even more important, particularly in giving effect to RMA s6c and RPS policies 23 and 24, as they are a tool that allows areas proposed for clearance to be assessed and appropriately managed via the resource consent process.	Seeks that performance standards for indigenous vegetation clearance under ECO-R2, with respect to the types of clearance that should be exempt from control, and the maximum permitted area of clearance for other types of vegetation, should be informed by appropriate expert evidence. (refer to original submission)	Oppose	Transpower supports the approach outlined and requested in its original submission, and therefore opposes any contrary relief.	The whole of the submission point be disallowed
<b>Royal Forest and Bird Protection Society of New Zealand Inc.</b>							
Royal Forest and Bird Protection Society of New Zealand Inc. 424.1a	New Rule	Amend	To fulfil Hutt City Council's obligations to identify and protect areas of significant indigenous vegetation and significant habitats of indigenous fauna under s6(c) of the RMA (refer to original submission for full reasons)	Seeks that new activities within Significant Natural Resource Areas (listed in Appendix 1 of the submission) are at least classified as non-complying and where there is certainty that an activity would not be appropriate within those areas include a prohibited activity classification (see original submission for Appendix 1)	Oppose	Transpower opposes the provision and application of a blanket non-complying and prohibited activity status that would apply to National Grid activities within a SNA, on the basis the relief would not give effect to the NPSET.	The whole of the submission point be disallowed
Royal Forest and Bird Protection Society of New Zealand Inc. 424.35	ECO-O1 (Ecosystems and indigenous biodiversity)	Support in part	The objective appears to generally align with Council's obligation to maintain biodiversity under s31(1)(b)(iii). However, it is not clear in terms of indigenous vegetation and habitats which are to be protected in accordance with s6(c). Habitats could include exotic vegetation, for example macrocarpa shelterbelts are increasingly important roosting habitat for native bats. We oppose the use of 'enhance' as it is uncertain as to what outcome is to be achieved. Restoration is a more appropriate term.	Seeks to retain with amendment: <u>Areas of significant indigenous vegetation and significant habitats of indigenous fauna are protected and indigenous biodiversity in Lower Hutt is maintained, and where practicable, restored or enhanced.</u>	Oppose	Transpower supports the objective as notified.	The whole of the submission point be disallowed
Royal Forest and Bird Protection Society of New Zealand Inc. 424.37	ECO-P1 Protecting indigenous biodiversity	Oppose	Same issues as for Policy ECO-P1. Other zones including Industrial zones may also hold important indigenous biodiversity values which could adversely affected by vegetation removal. The word "Controlling" suggests controlled activity rules which may not be adequate to protect biodiversity values or manage removal of indigenous vegetation.	Seeks to amend or replace this policy, for example as follows: Amend to: ECO-P1 (Protecting indigenous biodiversity <u>in rural environments</u> ) "Protect indigenous biodiversity <u>in rural environments</u> by: <u>i) ensuring adverse effects of activities on significant indigenous vegetation and the significant habitats of indigenous fauna are no more than minor; and</u> <u>ii) restricting controlling the removal of indigenous vegetation in the Natural Open Space Zone.</u>	Oppose	While Transpower is accepting of the intent of the policy, it does not support the wording 'protection' within the policy given the policy applies to indigenous biodiversity generally, and is not confined to significant indigenous biodiversity.	The whole of the submission point be disallowed
Royal Forest and Bird Protection Society of New Zealand Inc. 424.40	ECO - Ecosystems and Indigenous Biodiversity	Oppose (requesting new provision)	The Plan does not give effect to the Council's obligation to maintain indigenous biodiversity under the NPS-IB and the RPS. Support for restoration by way of third parties in ECO-P5 is not sufficient. Policy 61 of the RPS outlines how maintenance should be done in district plans. As such we seek a new policy to more explicitly provide for this. We also seek that the relevant rules, including those that provide for vegetation clearance/modification and/or earthworks in other chapters, are within limits that implement this policy (for example to ensure adverse effects would be no more than minor) and include matters of discretion with scope to apply the ECO policies. In addition to providing direction with respect to effects of vegetation removal under the rules in this chapter, this policy is intended to provide direction for the consideration of activities managed under other chapters of plan with respect to effects on indigenous biodiversity.	Add new policy as follows: <u>ECO-PX1 Maintenance of indigenous biodiversity</u> <u>1. To have regard to the following potential adverse effects in considering subdivision, land use and development that may adversely affect indigenous ecosystems and habitats with indigenous biodiversity values:</u> <u>a. Fragmentation of, or reduction in the extent of, indigenous vegetation or habitats of indigenous fauna;</u> <u>b. Fragmentation or disruption of connections and linkages between ecosystems or habitats of indigenous fauna;</u> <u>c. Loss of, or damage to, buffering of ecosystems or habitats of indigenous fauna; and</u> <u>d. Loss or reduction of rare or threatened indigenous species' populations or habitats.</u>	Oppose	Subject to the amendments as sought by the Transpower submission, Transpower supports the approach within the existing policy framework as notified, and does not consider the proposed policy appropriate for indigenous biodiversity generally, as applied to the National Grid.	The whole of the submission point be disallowed
Royal Forest and Bird Protection Society of New Zealand Inc. 424.41	ECO - Ecosystems and Indigenous Biodiversity	Oppose (requesting new provision)	As per our submission points (paragraphs 5-14) at the beginning, it is necessary for the Plan to include a policy aimed at identification and protection of SNAs in Lower Hutt. This is important for assessing the potential for adverse effects on significant indigenous biodiversity as part of consenting processes and to guide future district wide surveys. While we accept that the council cannot "map" SNAs within the District Plan under the NPSIB for three years, policy direction on identification is appropriate to apply during consent processes to provide for protection	Add new policy as follows: <u>ECO-PX2 Identify significant biodiversity values in Lower Hutt "Identify those areas that are habitats comprising significant indigenous vegetation or significant habitats of indigenous fauna in Lower Hutt as significant natural areas by applying the significance criteria in Policy 23 of the RPS, including through resource consent processes."</u>	Oppose	While Transpower supports the identification of SNA's in principle, the relief sought is inconsistent with national direction.  It conflicts with the Government's Resource Management (Freshwater and Other Matters) Amendment Bill which has suspended the requirement for councils to identify new	The whole of the submission point be disallowed

			required by s6(c) and would give effect to the RPS. It needs to be clear that the identification meets the criteria for significance as identified in Policy 23 of the RPS.			Significant Natural Areas (SNAs) in accordance with the NPS-IB for three years	
<b>KiwiRail Holdings Ltd</b>							
KiwiRail Holdings Ltd 442.52	PINF - Protection of infrastructure  PINF-P1	Amend	Reasons given are in connection to other submission points in submission, see original submission	Seeks that "clauses (1) and (2) which relate to avoiding development in particular locations, be merged into a more general provision identifying the need for setbacks from electrical, gas and rail infrastructure", and Amend  "Regionally significant infrastructure is protected from incompatible new subdivision, use and development, <u>including the potential for reverse sensitivity effects</u> by:  1. Avoiding the location of activities sensitive to hazardous substance risk within a defined risk management overlay.  2. Avoiding activities sensitive to the National Grid, and controlling buildings, structures and earthworks <del>within a defined National Grid Yard.</del>  ...  <u>6. Managing access to the rail corridor and the national and regional road network.</u>  <u>7. Ensuring new development maintains the safe and efficient operation of railway level crossings for all road users and the rail corridor.</u>  <u>8. Managing new activities and development through setbacks from existing electricity supply, gas supply and rail infrastructure"</u>	Oppose	Notwithstanding the more specific policy INF-P3, Transpower does not support the merging of the clauses as sought by the submitter. Specifically, Transpower opposes the amendment to clause 2, and the provision of a new clause 8. as drafted on the basis the new clause 8 is not specific to the National Grid Yard. The preferred clause wording is the original clause 2 which states 'within a defined National Grid Yard'.  Transpower supports the policy as notified.	The whole of the submission point be disallowed
<b>Wellington Regional Council</b>							
Wellington Regional Council 452.7	New Definition	Oppose (requesting new provision)	New definition is needed as this term is used in the policy and rule framework. The definition from the NPS-IB will support appropriate application of the ECO chapter provisions.	Add a new definition as follows:  <u>Habitat: means the area or environment where an organism or ecological community lives or occurs naturally for some or all of its life cycle, or as part of its seasonal feeding or breeding pattern; but does not include built structures or an area or environment where an organism is present only fleetingly.</u>	Oppose	Transpower does not consider the inclusion of the proposed definition necessary in this instance.	The whole of the submission point be disallowed
Wellington Regional Council 452.107	ECO-O1 Ecosystems and indigenous biodiversity	Amend	Support this objective, however seek that it is extended to provide for protection of indigenous biodiversity and that it reflects the RMA section 6 and NPSIB objective to maintain indigenous biodiversity so that there is at least no overall loss in indigenous biodiversity. A definition for "Maintain/maintained / maintenance (in relation to indigenous biodiversity)" is required to ensure that no overall loss is managed appropriately, for example so that it does not enable a trade-off of indigenous vegetation extent for biodiversity condition and richness.	Amend the objective as follows:  ECO-O1 Ecosystems and indigenous biodiversity Indigenous biodiversity in Lower Hutt <u>is protected</u> and maintained, and where practicable, restored or enhanced, <u>so there is at least no overall loss in indigenous biodiversity.</u>	Oppose	Transpower does not support the proposed wording as it would require the protection of all indigenous biodiversity, not just significant indigenous biodiversity, which the NPS-IB provides for.	The whole of the submission point be disallowed
Wellington Regional Council 452.116	ECO-R2.1 (Indigenous vegetation removal)	Amend	Lack of conditions and limited parameters concerning given areas are likely to include areas of indigenous vegetation, including areas that could meet the significant criteria in the NPS-IB and operative RPS.	Amend rule to restrict this rule's application to the following zones:  Commercial and Mixed Use Zones Industrial Zones <del>Rural Zones</del> Sport and Active Recreation Zone Open Space Zone Hospital Zone Tertiary Education Zone Marae Zone <del>Quarry Zone</del> Seaview Marina Zone	Oppose	As per its original submission, Transpower supports the permitted activity status within ECO-R2.1.  The deletion of Rural Zones and Quarry Zones is not supported.	The whole of the submission point be disallowed
Wellington Regional Council 452.119	ECO-R2(3)	Oppose (seeks new provision)	Indigenous vegetation removal is currently permitted in rural zones, open space zone and quarry zone with no conditions or limiting parameters. GW seeks that indigenous vegetation removal/modification in natural open space zone, rural zones, open space zone and quarry zone be allowed only when it is necessary for the activities/purposes listed in the permitted activity conditions. This is because significant indigenous vegetation and significant habitats of indigenous fauna are highly likely to be present in	Seeks to replace rule ECO-R2.3 with a new rule that would control indigenous vegetation clearance in Natural Open Space, Open Space, Rural, and Quarry Zones, see original submission (p29-30) for details.	Oppose.	Transpower opposes the relief sought, and prefers the relief sought in its own submission.  Transpower has existing National Grid assets within the Natural Open Space zones (and other zones). Vegetation around and underneath the existing assets is required to	The whole of the submission point be disallowed

			those zones.			be trimmed, cleared or modified to ensure the ongoing operation of the existing assets. While Transpower accepts the development of any new National Grid assets would be subject to rules, it support a permitted activity status for its existing assets.	
Wellington Regional Council 452.120a	ECO-R2. (4)	Oppose	Reasons given are in connection with other submission points, see original submission (see above)	Seeks to add Rural Zones, Open Space Zone, and Quarry Zone to application of ECO-R2.4, change activity status to Discretionary, and remove conditions [except, inferred, the condition that ECOR2.2 is not met] and information requirements. [add a condition that the rule sought in submission point 452.118 is not met, inferred]	Oppose	For the reasons outlined in its original submission, Transpower opposes the sought amendments to ECO-R2.	The whole of the submission point be disallowed