

Section 32 Evaluation Report

Part 2: Infrastructure

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Table of acronyms

Abbreviation	Full term
LTA	Land Transport Act
NES	National Environmental Standards
NES-ETA	National Environmental Standard for Electricity Transmission Activities 2009
NES-FW	National Environmental Standard for Freshwater 2020
NES-TF	National Freshwater Standard for Telecommunication Facilities 2016
NIMT	North Island Main Trunk
NPS	National Policy Statements
NPS-ET	National Policy Statement for Electricity Transmission 2008
NPS-FM	National Policy Statement for Freshwater Management 2020
NPS-UD	National Policy Statement on Urban Development
NZTA	Waka Kotahi NZ Transport Agency
PDP	Proposed District Plan
PNRP	Proposed Natural Resources Plan
RLTP	Regional Land Transport Plan
RMA	Resource Management Act
RPS	Regional Policy Statement for the Wellington Region 2013

1.0 Overview and Purpose

1.1 Introduction to the resource management issue/s

This section 32 evaluation report is focussed on Infrastructure. The purpose of the topic is to provide for the efficient and effective provision of infrastructure in Wellington City. Infrastructure is a physical resource of considerable importance to Wellington, because it supports the City and enables people and communities to meet their social, economic and cultural needs. Infrastructure is critical to the efficient and ongoing functioning of the City and therefore has wide-ranging benefits.

The definition of Infrastructure in the RMA includes structures for transport on land. As such, the provisions for the development, maintenance, repair and upgrading of and connections to the transport network are contained in the Infrastructure chapter. The provisions for on-site transport facilities and management of the transport effects of land use activities are contained in the Transport chapter.

The definition of Infrastructure in the RMA also includes facilities for the generation of electricity, drainage systems, airports, and ports. However, it is proposed that provisions pertaining to the generation of renewable electricity, some three waters infrastructure, activities undertaken by Wellington International Airport within their zone, and activities undertaken by CentrePort within their zone are subject to standalone provisions within separate chapters of the Proposed District Plan (PDP).

Infrastructure is a necessary part of the urban and rural environment. However, as with other forms of use and development, there are potential adverse effects on the environment arising from the operation, maintenance, renewal and upgrading of existing infrastructure, as well as the construction of new infrastructure.

The development of some land uses close to infrastructure may also limit the ability for that infrastructure to function and be maintained effectively. This can occur through physical limitations on access or other limitations on necessary operational, maintenance or upgrading activities, or through 'reverse sensitivity' where the effects of the existing infrastructure.

The operative district plan includes a separate "utilities" chapter, which addresses most infrastructure activities¹, and includes the objectives, policies, rules and methods which apply on a City-wide basis. This chapter was included when the district plan was first made operative, but has been tweaked since then through plan changes, including Plan Change 14 – Utility Rules and Associated Definitions (operative 2006), and Plan Change 74 – Telecommunication Structures (operative 2013)

Since the utilities chapter was first introduced, the National Policy Statement on Electricity Transmission 2008, National Policy Statement on Urban Development Capacity 2016, National Policy Statement on Urban Development 2020, National Environmental Standards for Electricity Transmission Activities, and the National Environmental Standards for Telecommunication Facilities 2016 have come into effect, which provide additional national direction in relation to providing for infrastructure.

2.0 Reference to other evaluation reports

This report should also be read in conjunction with the following evaluation reports:

¹ This chapter does not include transport, three waters, port, airport or renewable energy generation provisions. Port, Airport and Renewable Energy Generation activities are subject to separate chapters, and transport and three waters provisions are addressed in each zone chapter.

Report	Relationship to this topic
Transport	This chapter contains provisions relating to managing the effects of development on the transport network. Structures for transport are included as infrastructure under the RMA definition and are therefore addressed in the Infrastructure chapter. The Transport chapter provisions must be highly integrated with the Infrastructure provisions to avoid conflicts.
Renewable Electricity Generation	This chapter contains provisions relating to the construction, operation, and maintenance of renewable electricity generation facilities. While such structures are included as infrastructure under the RMA definition, a standalone chapter for Renewable Electricity Generation is considered the most appropriate way to give effect to the National Policy Statement for Renewable Electricity Generation 2011.
Port	This chapter contains provisions relating to the construction, operation, and maintenance of port facilities. While Port's are included as infrastructure under the RMA definition, the National Planning Standards provide for Port Zones as Special Purpose Zones, so that is how they have been addressed in the Proposed District Plan.
Airport	This chapter contains provisions relating to the construction, operation, and maintenance of airport facilities. While Airport's are included as infrastructure under the RMA definition, the National Planning Standards provide for Airport Zones as Special Purpose Zones, so that is how they have been addressed in the Proposed District Plan.
Three Waters	This chapter contains provisions addressing land development effects on three waters infrastructure. This differs from the Infrastructure chapter, which addresses the construction, operation and maintenance of the physical three waters infrastructure.
Subdivision	This chapter sets out provisions for the subdivision of land. The objectives, policies and rules include those addressing subdivision for infrastructure, and controlling potential effects on infrastructure including the National Grid. Requirements are also placed on new allotments in relation to connection to infrastructure networks. These provisions therefore integrate with and support the provisions of the Infrastructure chapter.
Earthworks	This chapter includes provisions addressing earthworks. These provisions do not apply to infrastructure, as earthworks are addressed in the infrastructure chapter. However, this chapter addresses earthworks within the Gas Transmission Pipeline Corridor and National Grid Yard, and therefore integrates with and gives effect to the objectives and policies of the Infrastructure chapter.
Noise	All infrastructure must comply with the noise standards for the underlying zone as set out in this chapter. This chapter also addresses the issue of reverse sensitivity in relation to regionally significant roads and rail.
Light	All infrastructure must comply with the light standards for the underlying zone as set out in this chapter.

Signs	This chapter includes provisions addressing signs across the district. Signs can improve or detract from traffic safety and therefore their management is important where they interface with the transport network. The signs provisions do not apply to infrastructure, except where specifically referenced in the Infrastructure chapter
Natural Hazards	<p>These chapters contain provisions relating to sites and areas of particular significance or have values which are protected from inappropriate development. These sites and areas are identified spatially on the district plan maps.</p> <p>As infrastructure provisions are to be applied district-wide and form a standalone chapter, they must recognise these sites and areas and integrate with these provisions to ensure that infrastructure operation, maintenance and repair, removal, upgrading and development activities do not compromise the significance, qualities, or values of the identified sites and areas.</p> <p>In the case of natural hazards, it is important that any infrastructure within areas subject to natural hazard risk does not exacerbate that risk to people or property.</p>
Historic Heritage	
Notable Trees	
Sites and Areas of Significance to Māori	
Viewshafts	
Ecosystems and Indigenous Biodiversity	
Natural Character	
Natural Features and Landscapes	

3.0 Strategic Direction

The following objectives in the Strategic Direction chapter of the PDP that are relevant to this issue/topic are:

Anga whakamua	
AW-01	<i>Resource management processes include mana whenua as active participants in a way that recognises Te Tiriti o Waitangi and its principles.</i>
AW-02	<p><i>The relationship of Tangata Whenua with their lands and traditions is recognised and provided for, including:</i></p> <ol style="list-style-type: none"> <i>1. The use, development and expansion of Treaty Settlement land and any land that is subject to Deed of Settlement provisions relating to right of first refusal land, in a manner that recognises its commercial redress purposes; and</i> <i>2. The use and development of all other land to provide for the social, economic, commercial, and cultural aspirations of Tangata Whenua.</i>
AW-03	<i>Mana whenua can exercise their customary responsibilities as mana whenua and kaitiaki with their own mātauranga Māori.</i>
AW-04	<i>The development and design of the City reflects mana whenua and the contribution of their culture, traditions, ancestral lands, waterbodies, sites, areas and landscapes, and other taonga of significance to the district's identity and sense of belonging.</i>

Capital City	
CC-O2	<p><i>Wellington City is a well-functioning Capital City where:</i></p> <ol style="list-style-type: none"> <i>1. A wide range of activities that have local, regional and national significance are able to establish.</i> <i>2. The social, cultural, economic and environmental wellbeing of current and future residents is supported;</i> <i>3. Mana whenua values and aspirations become an integral part of the City's identity.</i> <i>4. Urban intensification is delivered in appropriate locations and in a manner that meets the needs of current and future generations;</i> <i>5. Innovation and technology advances that support the social, cultural, economic and environmental wellbeing of existing and future residents are promoted; and</i> <i>6. Values and characteristics that are an important part of the City's identity and sense of place are identified and protected.</i>
CC-O3	<p><i>Development is consistent with and supports the achievement of the following strategic City goals:</i></p> <ol style="list-style-type: none"> <i>1. Compact: Wellington builds on its existing urban form with quality development in the right locations;</i> <i>2. Resilient: Wellington's natural and built environments are healthy and robust, and we build physical and social resilience through good design;</i> <i>3. Vibrant and Prosperous: Wellington builds on its reputation as an economic hub and creative centre of excellence by welcoming and supporting innovation and investing strategically to maintain our thriving economy;</i> <i>4. Inclusive and Connected: Wellington recognises and fosters its identity by supporting social cohesion and cultural diversity, and has world-class movement systems with attractive and accessible public spaces and streets;</i> <i>5. Greener: Wellington is sustainable and its natural environment is protected, enhanced and integrated into the urban environment; and</i> <i>6. Partnership with mana whenua: Wellington recognises the unique role of mana whenua within the city and advances a relationship based on active partnership.</i>
Historic Heritage and Sites and Areas of Significance to Māori	
HHSASM-O2	<i>Built heritage is resilient and has a sustainable long term use while ensuring heritage and cultural values are recognised and maintained.</i>
HHSASM-O3	<i>The cultural, spiritual and/or historical values associated with sites and areas of significance to Māori are protected.</i>
Natural Environment	
NE-O1	<i>The natural character, landscapes and features, and ecosystems that contribute to the City's identity and have significance for mana whenua as kaitiaki are identified, recognised, protected, and, where possible, enhanced.</i>

Strategic City Assets and Infrastructure	
SCA-O1	<p>Infrastructure is established, operated, maintained, and upgraded in Wellington City so that:</p> <ol style="list-style-type: none"> 1. The social, economic, cultural, and environmental benefits of this infrastructure are recognised; 2. The City is able to function efficiently and effectively; 3. The infrastructure network is resilient in the long term; and 4. Future growth and development is enabled and can be sufficiently serviced.
SCA-O2	<p>New urban development occurs in locations that are supported by sufficient development infrastructure capacity, or where this is not the case the development:</p> <ol style="list-style-type: none"> 1. Can meet the development infrastructure costs associated with the development, and 2. Supports a significant increase in development capacity for the City.
SCA-O3	<p>Additional infrastructure is incorporated into new urban developments of a nature and scale that supports Strategic Objective UFD-O6 or provides significant benefits at a regional or national scale.</p>
SCA-O5	<p>The adverse effects of infrastructure are managed having regard to the economic, social, environmental and cultural benefits, and the technical and operational needs of infrastructure.</p>
SCA-O6	<p>Infrastructure operates efficiently and safely and is protected from incompatible development and activities that may create reverse sensitivity effects.</p>
Sustainability, Resilience and Climate Change	
SRCC-O1	<p>The City's built environment supports:</p> <ol style="list-style-type: none"> 1. A net reduction in the City's carbon emissions by 2050; 2. More energy efficient buildings; 3. An increase in the use of renewable energy sources; and 4. Healthy functioning of native ecosystems and natural processes.
SRCC-O2	<p>Risks from natural hazards are:</p> <ol style="list-style-type: none"> 1. Identified and understood; 2. Planned for through adaptation and mitigation measures to ensure the risks are low; and 3. Avoided where the risks are intolerable.
SRCC-O3	<p>Subdivision, development and use:</p> <ol style="list-style-type: none"> 1. Effectively manage the risks associated with climate change and sea level rise; 2. Support the City's ability to adapt over time to the impacts of climate change and sea level rise; and 3. Support natural functioning ecosystems and processes to help build resilience into the natural and built environments.

Urban Form and Development

UFD-07	<p><i>Development supports the creation of a liveable, well-functioning urban environment that enables all people and communities to provide for their social, economic, environmental, and cultural wellbeing, and:</i></p> <ol style="list-style-type: none"> <i>1. Is accessible and well designed;</i> <i>2. Supports sustainable travel choices, including active and micromobility modes;</i> <i>3. Is serviced by the necessary infrastructure appropriate to the intensity, scale and function of the development and urban environment;</i> <i>4. Is socially inclusive;</i> <i>5. Is ecologically sensitive;</i> <i>6. Is respectful of the City's historic heritage;</i> <i>7. Provides for community well-being; and</i> <i>8. Is adaptable over time and responsive to its evolving, more intensive surrounding context.</i>
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An evaluation of these objectives is contained in the companion Section 32 Evaluation Overview Report.

4.0 Regulatory and policy direction

In carrying out a s32 analysis, an evaluation is required of how the proposal achieves the purpose and principles contained in Part 2 of the RMA.

Section 5 sets out the purpose of the RMA, which is to promote the sustainable management of natural and physical resources.

Sustainable management *'means managing the use, development, and protection of natural and physical resources to enable people and communities to provide for their social, economic and cultural wellbeing 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'.*

In achieving this purpose, all persons exercising functions and powers under the RMA also need to:

- Recognise and provide for the matters of national importance identified in s6
- Have particular regard to the range of other matters referred to in s7
- Take into account the principles of the Treaty of Waitangi/Te Tiriti o Waitangi in s8.

4.1 Section 6

The s6 matters relevant to this topic are:

Section	Relevant Matter
Section s6(a)	<i>The preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development</i>

	<p>Infrastructure may have an operational or functional need to be located or partially located within the coastal environment or the margins of waterbodies. This matter sets a direction that these areas must be protected from inappropriate use and development, including in relation to infrastructure.</p>
Section s6(b)	<p><i>The protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development</i></p> <p>Infrastructure may have an operational or functional need to be located or partially located within outstanding natural features and landscapes. This matter sets a direction that these areas must be protected from inappropriate use and development, including in relation to infrastructure.</p>
Section s6(c)	<p><i>The protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna</i></p> <p>The development, operation, maintenance, upgrade, or removal of infrastructure may at times require works to be undertaken within areas of significant indigenous vegetation or significant habitats of indigenous fauna, or infrastructure may have an operational or functional need to be located or partially located within such areas. This matter sets a direction that these areas must be protected, including in relation to infrastructure.</p>
Section s6(d)	<p><i>The maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers</i></p> <p>Infrastructure located or partially located within the coastal environment or the margins of waterbodies may impact public access within those areas. This matter sets a direction that development, operation, maintenance, upgrade, or removal of infrastructure needs to maintain or enhance access within these areas.</p>
Section s6(e)	<p><i>The relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga</i></p> <p>Infrastructure may have an operational or functional need to be located or partially located within sites or areas of significance to Māori. The relationship of Māori and their culture and traditions to these sites must be recognised and provided for in these instances.</p>
Section s6(f)	<p><i>The protection of historic heritage from inappropriate subdivision, use, and development</i></p> <p>The development, operation, maintenance, upgrade or removal of infrastructure may at times require works to be undertaken which may affect areas or sites with historic heritage values. This matter sets a direction that these sites or areas must be protected, including in relation to infrastructure.</p>
Section s6(h)	<p><i>The management of the significant risks from natural hazards</i></p> <p>Infrastructure has the potential to be adversely affected by natural hazard events, in turn affecting the resilience of people and communities. The development, operation, maintenance, upgrade or removal of infrastructure also has the potential to affect natural hazard risks, both positively and negatively.</p>

4.2 Section 7

The s7 matters that are relevant to this topic are:

Section	Relevant Matter
Section s7(b)	<p><i>The efficient use and development of natural and physical resources</i></p> <p>This matter includes the efficient use and development of land, including for infrastructure development, operation, maintenance and repair, upgrade, or removal purposes. As such these activities should not be unduly restricted where they are appropriate and consistent with the purpose and principals of the Act.</p>
Section s7(ba)	<p><i>The efficiency of the end use of energy</i></p> <p>The development, operation, maintenance and repair, upgrade or removal of infrastructure has the potential to influence the efficiency of the end use of energy, through enabling different, potentially more efficient, energy sources to be used.</p>
Section s7(c)	<p><i>The maintenance and enhancement of amenity values</i></p> <p>Infrastructure can include large or geographically extensive structures. These structures may be located within urban areas connecting end users, or within less developed areas providing connections between urban areas, as well as serving those areas. These structures therefore have the potential to have adverse effects on the amenity values of the areas in which they are located, and these values may differ between these areas.</p> <p>This matter provides direction that the amenity values should be maintained or enhanced, and not degraded by the development, operation, maintenance, upgrade or removal of infrastructure.</p>
Section s7(f)	<p><i>The maintenance and enhancement of the quality of the environment</i></p> <p>Given the definition of 'environment' in section 2 of the RMA, the development, operation, maintenance, upgrade or removal of infrastructure has the potential to affect the quality of the environment through effects on amenity values as noted above, as well as wider effects on people and communities; other natural and physical resources; and social, economic and cultural conditions which may include sites and areas of significance or values, including those relating to matters of national importance under s6 (a), (b), (c), (e) and (f).</p>

4.3 Section 8

The Council and Taranaki Whānui ki te Upoko o te Ika and Ngāti Toa Rangatira have worked in partnership to develop District Plan provisions that recognise and protect sites and areas of significance. There are no specific requirements in the Infrastructure Chapters, as sites and areas of significance are primarily provided for through overlays.

4.4 National Direction

4.4.1 National Policy Statements

There are five National Policy Statements (NPS) currently in force:

- NPS for Electricity Transmission 2008
- New Zealand Coastal Policy Statement 2010
- NPS for Renewable Electricity Generation 2011
- NPS for Freshwater Management 2020
- NPS on Urban Development 2020

The instrument/s and associated provisions relevant to this topic are:

NPS	Relevant Objectives / Policies
NPS for Electricity Transmission 2008	<p>The purpose of the NPSET is to enable the management of the effects of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources, while managing the effects of and on the network. The single objective and 13 of the 14 supporting policies are relevant to this topic.</p>
New Zealand Coastal Policy Statement 2010	<p>New Zealand Coastal Policy Statement 2010 The purpose of the NZCPS is to state policies in order to achieve the purpose of the Act in relation to the coastal environments of New Zealand.</p> <p>The relevant objective and policies are:</p> <ul style="list-style-type: none"> • Objective 4: To maintain and enhance the public open space qualities and recreation opportunities of the coastal environment by: [...] • Objective 6: To enable people and communities to provide for their social, economic, and cultural wellbeing and their health and safety, through subdivision, use, and development, recognising that: <ul style="list-style-type: none"> - the coastal environment contains renewable energy resources of significant value • Policy 6: Activities in the coastal environment <ul style="list-style-type: none"> (1) In relation to the coastal environment: <ul style="list-style-type: none"> (a) recognise that the provision of infrastructure, the supply and transport of energy including the generation and transmission of electricity, and the extraction of minerals are activities important to the social, economic and cultural wellbeing of people and communities; • Policy 13 Preservation of natural character <ul style="list-style-type: none"> (1) To preserve the natural character of the coastal environment and to protect it from inappropriate subdivision, use, and development: [...] • Policy 15 Natural features and natural landscapes <ul style="list-style-type: none"> To protect the natural features and natural landscapes (including seascapes) of the coastal environment from inappropriate subdivision, use, and development:[...] • Policy 19 Walking access • Policy 25: Subdivision, use, and development in areas of coastal hazard risk <ul style="list-style-type: none"> [...] (d) encourage the location of infrastructure away from area of hazard risk where practicable

<p>NPS on Urban Development 2020</p>	<p>The NPS-UD aims to support well-functioning urban environments to provide for current and future community well-being. It requires RMA plans to provide opportunities for land development to meet housing and business needs, supported by adequate development capacity. Although the NPS-UD largely applies to urban environments, there are some polices that apply to the entire City.</p> <p>The relevant objective and policies are:</p> <ul style="list-style-type: none"> • Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. • Objective 4: New Zealand’s urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations. • Objective 6: Local authority decisions on urban development that affect urban environments are: <ul style="list-style-type: none"> (a) integrated with infrastructure planning and funding decisions; and [...] • Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum: <ul style="list-style-type: none"> (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and • Policy 2: Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term. • Policy 10: Tier 1, 2, and 3 local authorities: <ul style="list-style-type: none"> (b) engage with providers of development infrastructure and additional infrastructure to achieve integrated land use and infrastructure planning; and
<p>NPS for Freshwater Management 2020</p>	<p>The NPS-FM aims to provide local authorities with direction on how freshwater should be managed under the RMA. It is primarily directed at Regional Councils. There are no specific objectives and policies directed at infrastructure, however the implementation section of the NPS-FM recognises that infrastructure activities may be necessary in or near freshwater.</p>

4.4.2 Proposed National Policy Statements

In addition to the five NPSs currently in force there are also two proposed NPSs under development, noting that these are yet to be issued (as of July 2022) and have no legal effect:

- Proposed NPS for Highly Productive Land
- Proposed NPS for Indigenous Biodiversity

4.4.3 National Environmental Standards

In addition to the NPSs there are nine National Environmental Standards (NES) currently in force:

- NES for Air Quality 2004
- NES for Sources of Human Drinking Water 2007
- NES for Electricity Transmission Activities 2009
- NES for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
- NES for Telecommunication Facilities 2016
- NES for Plantation Forestry 2017
- NES for Freshwater 2020
- NES for Marine Aquaculture 2020
- NES for Storing Tyres Outdoors 2021

The following standard/s and associated provisions relevant to this topic are:

NES	Relevant Regulations
NES for Electricity Transmission Activities 2009	<p>The NESETA applies to the National Grid network as it existed at 14 January 2010.</p> <p>Operating, maintaining, upgrading, relocation or removal of an existing transmission line infrastructure</p> <p>Regulation 14 – permitted activity conditions for transmission line support structures: alteration, relocation, and replacement</p> <p>Regulation 25 – permitted activity conditions for transmission line support structures: discharges from blasting and applying protective coatings</p> <p>Activities that are permitted include:</p> <ul style="list-style-type: none"> • operating existing transmission lines • maintaining conductors (wires) and adding a limited number of conductors provided limits on electric and magnetic fields are not exceeded • signs on transmission line support structures (within specified size limits) • strengthening, upgrading and replacing support structures and foundations. <p>Activities that are controlled include:</p> <ul style="list-style-type: none"> • moving overhead transmission lines underground, • moving poles and towers more than a specified distance from their existing location <p>Activities that are restricted discretionary include:</p> <ul style="list-style-type: none"> • moving poles and pylons beyond the distanced specified for a controlled activity • earthworks on potentially contaminated land

<p>NES for Telecommunication Facilities 2016</p>	<p>The NESTF covers the installation and operation of some telecommunication facilities, including the generation of radiofrequency fields.</p> <p>Regulation 19 – permitted activity conditions for cabinets</p> <p>Regulations 26, 28, 30, 32, 34, 36 – permitted activity conditions for antennas</p> <p>Regulation 38 – permitted activity conditions for cell units</p> <p>Regulation 39 – permitted activity conditions for customer connection lines</p> <p>Regulation 41 – permitted activity conditions for aerial telecommunication lines</p> <p>Regulation 43 – permitted activity conditions for underground telecommunication lines</p> <p>Regulation 53 – permitted activity conditions for earthworks Regulation 55 – permitted activity conditions for radiofrequency field</p> <p>It covers the following activities:</p> <ul style="list-style-type: none"> • cabinets in the road reserve, outside the road reserve and on buildings • antennas on existing poles in the road reserve • antennas on new poles in the road reserve • replacement, upgrading and co-location of existing poles and antennas outside road reserve (with different conditions in residential and non-residential areas) • new poles and antennas in rural areas • antennas on buildings (above a permitted height in residential areas) • small-cell units on existing structures • telecommunications lines (underground, on the ground and overhead).
<p>NES for Freshwater 2020</p>	<p>The NESFW is relevant to infrastructure activities. It sets out requirements for carrying out certain activities that pose risks to freshwater and freshwater ecosystems. Anyone carrying out these activities will need to comply with the standards. The NES-FW aims to:</p> <ul style="list-style-type: none"> • protect existing inland and coastal wetlands • protect urban and rural streams from in-filling • ensure connectivity of fish habitat (fish passage) • set minimum requirements for feedlots and other stockholding areas • improve poor practice intensive winter grazing of forage crops • restrict further agricultural intensification until the end of 2024 • limit the discharge of synthetic nitrogen fertiliser to land, and require reporting of fertiliser use.

	The NESFW includes standards relating to the construction of specified infrastructure (as defined in the NPSFM) and the maintenance and operation of specified infrastructure and other infrastructure. These standards set the activity status for clearance of vegetation and earthworks within setbacks from natural wetlands.
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4.4.4 National Planning Standards

The National Planning Standards require that there is an Energy, Infrastructure and Transport section in Part 2 – District Wide Matters of the District Plan. The District-wide matters standard requires the following:

5. *Provisions relating to energy, infrastructure and transport that are not specific to the Special purpose zones chapter or sections must be located in one or more chapters under the Energy, infrastructure and transport heading. These provisions may include:*
 - a. *statement about the status of transport corridors eg, the adjoining zoning applies to the centre line of mapped roads*
 - b. *noise-related metrics and noise measurement methods relating to energy, infrastructure and transport, which must be consistent with the 15. Noise and vibration metrics Standard*
 - c. *the management of reverse sensitivity effects between infrastructure and other activities.*
6. *The chapters under the Energy, infrastructure and transport heading must include cross-references to any energy, infrastructure and transport provisions in a Special purpose zones chapter or sections.*
7. *Zone chapters must include cross-references to relevant provisions under the Energy, infrastructure and transport heading.*
8. *All chapters must be included alphabetically.*

4.5 National Guidance Documents

The following national guidance documents are considered relevant to this topic:

Document	Relevant provisions
National Policy Statement on Electricity Transmission: Implementation guidance for local authorities (Ministry for the Environment)	This document provides guidance on the NPSET by: <ul style="list-style-type: none"> • setting out how the National Policy Statement on NPSET can best be incorporated into regional and district planning instruments; • provides an analysis of the objective and policies of the NPSET; and • gives examples of a range of regional policy statement and district plan provisions to give effect to the NPSET.

<p>National Policy Statement on Electricity Transmission: Further guidance on risks of development near high-voltage transmission lines</p> <p>(Ministry for the Environment)</p>	<p>This document provides further information on the risks of development and activities in relation to the transmission network, and how these could be regulated under the RMA.</p>
<p>National Environmental Standards for Electricity Transmission Activities: Introduction (2010)</p> <p>(Ministry for the Environment)</p>	<p>This document provides guidance to:</p> <ul style="list-style-type: none"> • assess the resource consent requirements for the maintenance and upgrade of existing transmission lines and determine which activities are permitted. • understand how the NES implements the National Policy Statement on Electricity Transmission (the NPS).
<p>Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016: Users' guide.</p> <p>(Ministry for the Environment)</p>	<p>This document provides guidance on:</p> <ul style="list-style-type: none"> • understanding and applying the regulations, including the different types of telecommunication equipment, how to assess compliance with the NESTF 2016, baseline dates, and measurements; • types of facilities permitted under the regulations and specific scenarios and examples; • the radiofrequency field standards and requirements under the regulations; • areas with identified values where district plan rules may be more stringent than the regulations, and examples from district plans; • implementation of the regulations, including the requirements for local authorities.
<p>NES for Electricity Transmission Activities: Inclusion in District and Regional Plans (2010)</p> <p>(Ministry for the Environment)</p>	<p>This document provides guidance for local authorities on reviewing and amending district plans so the NES is fully incorporated in them. Several options are provided and illustrated.</p>
<p>NZTA Planning policy manual</p> <p>(Waka Kotahi)</p>	<p>This contains guidance for integrated planning and development of state highways.</p>
<p>NZS 4404:2010 Land development and subdivision – infrastructure</p>	<p>Provides criteria for design and construction of land development and subdivision infrastructure.</p>

(Standards New Zealand)	
BS/EN 1594:2013 Gas infrastructure (Standards New Zealand)	Addresses standards for pipelines with an operating pressure over 16 bar.

4.6 Regional Policy and Plans

Regional Policy Statement for the Wellington Region 2013 (RPS)

The table below identifies the relevant provisions and resource management topics for infrastructure contained in the RPS.

Section	Relevant matters
Objective 9	The region's energy needs are met in ways that: <ul style="list-style-type: none"> (a) improve energy efficiency and conservation; (b) diversify the type and scale of renewable energy development; (c) maximise the use of renewable energy resources; (d) reduce dependency on fossil fuels; and (e) reduce greenhouse gas emissions from transportation.
Objective 10	The social, economic, cultural, and environmental, benefits of regionally significant infrastructure are recognised and protected.
Objective 22	A compact well designed and sustainable regional form that has an integrated, safe, and responsive transport network and: <ul style="list-style-type: none"> (a) a viable and vibrant regional central business district in Wellington city; (b) an increased range and diversity of activities in and around the regionally significant centres to maintain vibrancy and vitality; (c) sufficient industrial-based employment locations or capacity to meet the region's needs; (d) development and/or management of the Regional Focus Areas identified in the Wellington Regional Strategy; (e) urban development in existing urban areas, or when beyond urban areas, development that reinforces the region's existing urban form; (f) strategically planned rural development; (g) a range of housing (including affordable housing); (h) integrated public open spaces; (i) integrated land use and transportation; (j) improved east-west transport linkages; (k) efficiently use existing infrastructure (including transport network infrastructure); and (l) essential social services to meet the region's needs.

Policy 7 (M)	District and regional plans shall include policies and/or methods that recognise: (a) the social, economic, cultural and environmental benefits of regionally significant infrastructure including: (i) people and goods can travel to, from and around the region efficiently and safely; (ii) public health and safety is maintained through the provision of essential services: - supply of potable water, the collection and transfer of sewage and stormwater, and the provision of emergency services; (iii) people have access to energy so as to meet their needs; and (iv) people have access to telecommunication services.
Policy 8 (M)	District and regional plans shall 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 10 (M)	District plans and the Wellington Regional Land Transport Strategy shall include policies to promote travel demand management mechanisms that reduce: (a) the use and consumption of non-renewable transport fuels; and (b) carbon dioxide emissions from transportation.
Policy 39 (R)	When considering an application for a resource consent, notice of requirement or a change, variation or review of a district or regional plan, particular regard shall be given to: (a) the social, economic, cultural and environmental benefits of energy generated from renewable energy resources and/or regionally significant infrastructure; and (b) protecting regionally significant infrastructure from incompatible subdivision, use and development occurring under, over, or adjacent to the infrastructure; and [...]
Policy 54 (R)	When considering an application for a notice of requirement, or a change, variation or review of a district or regional plan, for development, particular regard shall be given to achieving the region's urban design principles in Appendix 2.
Policy 55	When considering an application for a resource consent, or a change, variation or review of a district plan for urban development beyond the region's urban areas (as of March 2009), particular regard shall be given to whether: (a) the proposed development is the most appropriate option to achieve Objective 22; and (b) the proposed development is consistent with the Council's growth and/or development framework or strategy that describes where and how future urban development should occur in that district; and/or (c) a structure plan has been prepared.
Policy 57	When considering an application for a resource consent, notice of requirement, or a change, variation, or review of a district plan, for subdivision, use or development, particular regard shall be given to the following matters, in making progress towards achieving the key outcomes of the Wellington Regional Land Transport Strategy: (a) whether traffic generated by the proposed development can be accommodated within the existing transport network and the impacts on the efficiency, reliability or safety of the network;

	<p>(b) connectivity with, or provision of access to, public services or activities, key centres of employment activity or retail activity, open spaces or recreational areas;</p> <p>(c) whether there is good access to the strategic public transport network;</p> <p>(d) provision of safe and attractive environments for walking and cycling; and</p> <p>(e) whether new, or upgrades to existing, transport network infrastructure have been appropriately recognised and provided for.</p>
Policy 58 (R)	<p>When considering an application for a resource consent, notice of requirement, or a plan change, variation, or review of a district plan for subdivision, use or development, particular regard shall be given to whether the proposed subdivision, use or development is located and sequenced to:</p> <p>(a) make efficient and safe use of existing infrastructure capacity; and/or</p> <p>(b) coordinate with the development and operation of new infrastructure.</p>
Definition – regionally significant infrastructure	<p>Regionally significant infrastructure includes:</p> <ul style="list-style-type: none"> • pipelines for the distribution or transmission of natural or manufactured gas or petroleum • strategic telecommunications facilities, as defined in section 5 of the Telecommunications Act 2001 • strategic radio communications facilities, as defined in section 2(1) of the Radio Communications Act 1989 • the national electricity grid, as defined by the Electricity Governance Rules 2003 • facilities 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 treatment plants • the local authority wastewater and stormwater networks, systems and wastewater treatment plants • the Strategic Transport Network, as defined in the Wellington Regional Land Transport Strategy 2007-2016 • Wellington City bus terminal and Wellington Railway Station terminus • Wellington International Airport • Masterton Hood Aerodrome • Paraparaumu Airport • Commercial Port Areas 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.

M = policies which must be implemented in accordance with stated methods in the RPS
R = policies to which particular regard must be had when varying a district plan

Regional Plans

There are currently five operative regional plans and one proposed regional plan for the Wellington region:

- Regional Freshwater Plan for the Wellington Region, 1999
- Regional Coastal Plan for the Wellington Region, 2000
- Regional Air Quality Management Plan for the Wellington Region, 2000
- Regional Soil Plan for the Wellington Region, 2000

- Regional Plan for discharges to the land, 1999
- Proposed Natural Resources Plan, appeals version 2021

The proposed Natural Resources Plan (PNRP) replaces the five operative regional plans, with provisions in this plan now largely operative with the exception of those that are subject to appeal.

The table below identifies the relevant provisions for infrastructure contained in the PNRP.

Proposed Natural Resources Plan (Decisions Version) 2019	
Section	Relevant matters
Objective 12*	The social, economic, cultural, and environmental benefits of regionally significant infrastructure, renewable energy generation activities and the utilisation of mineral resources are recognised.
Objective 13*	Significant mineral resources and the ongoing operation, maintenance and upgrade of regionally significant infrastructure and renewable energy generation activities in the coastal marine area and beds of rivers and lakes are protected from new incompatible use and development occurring under, over, or adjacent to the infrastructure or activity.
Policy 12*	Benefits of regionally significant infrastructure and renewable electricity generation facilities The benefits of regionally significant infrastructure and renewable energy generation activities are recognised by having regard to: (a) the strategic integration of infrastructure and land use, and (b) the location of existing infrastructure and structures, and (c) the need for renewable energy generation activities to locate where the renewable energy resources exist, and (d) the functional need and operational requirements associated with developing, operating, maintaining and upgrading regionally significant infrastructure and renewable energy generation activities in the coastal marine area and the beds of lakes and rivers.
Policy 13*	Providing for regionally significant infrastructure and renewable electricity generation activities The use, development, operation, maintenance, and upgrade of regionally significant infrastructure and renewable energy generation activities are provided for.
Policy 14*	Incompatible activities adjacent to regionally significant infrastructure, renewable electricity generation activities and significant mineral resources Regionally significant infrastructure, renewable energy generation activities and significant mineral resources shall be protected from incompatible use and development occurring under, over or adjacent to it, by locating and designing any use and development to avoid, remedy or mitigate any reverse sensitivity effects.

<p>Definition Regionally significant infrastructure*</p>	<p>–</p>	<p>Regionally significant infrastructure includes:</p> <ul style="list-style-type: none"> • 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 grid • facilities for the generation and/or transmission of electricity where it is supplied to the National grid and/or the local distribution network., This excludes supply within the local distribution network. • the local authority water supply network (including intake structures) and water treatments plants • the local authority wastewater and stormwater network and, systems, including treatment plants and storage and discharge facilities • the Strategic Transport Network • Wellington City bus terminal and Wellington Railway Station terminus • Wellington International Airport • Masterton Hood Aerodrome • Kapiti Coast Airport • Commercial Port Area within Wellington Harbour (Port Nicholson) 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.
<p>Definition Reverse sensitivity*</p>	<p>–</p>	<p>The vulnerability of an existing lawfully established activity to other activities in the vicinity which are sensitive to adverse environmental effects that may be generated by such existing activities, thereby creating the potential for the operation of such existing activity to be constrained.</p>
<p>Definition Sensitive activity</p>	<p>–</p>	<p>Activities which suffer should they experience adverse effects typically associated with some lawful activities. For example, dust or noise from a quarry or port facility, noise in an entertainment precinct, smells from a sewage treatment facility. Activities considered sensitive include any residential activity, any early childhood education centre, and any hotel or other accommodation activity. It may also include hospitals and respite care facilities.</p>
<p>Definition Strategic Transport Network*</p>	<p>–</p>	<p>The Strategic Transport Network comprises the following parts of the Wellington Region's transport network:</p> <ol style="list-style-type: none"> (a) All railway corridors and 'core' bus routes as part of the region's public transport network identified in the Regional Land Transport Plan 2015, and (b) All strategic roads that are classified as a National High Volume Road, National Road, or Regional Road as part of the region's strategic road network identified in the Regional Land Transport Plan 2015, and (c) Any other road classified as a high productivity motor vehicle (HPMV) route identified in the Regional Land Transport Plan 2015, and (d) All sections of the regional cycling network classified as having a combined utility and recreational focus identified in the Regional Land Transport Plan 2015. <p>The Strategic Transport Network is mapped in the Regional Land Transport Plan 2015.</p>
<p>Definition –</p>	<p>–</p>	<p>Use and development to bring existing structures or facilities up to current</p>

Upgrade*	<p>standards or to improve the functional characteristics of structures or facilities, provided the upgrading itself does not give rise to any significant adverse effects on the environment and provided that the effects of the activity are the same or similar in character, intensity and scale as the existing structure and activity.</p> <p>In relation to renewable electricity generation activities, includes increasing the generation or transmission capacity, efficiency or security of regionally significant infrastructure and replacing support structures within the footprint of authorised activities.</p>
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*Provision under appeal

4.7 Iwi Management Plan(s)

There are no Iwi Management Plans relevant to this topic.

4.8 Relevant plans or strategies

The following plans / strategies are relevant to this topic:

Plan / Strategy	Organisation	Relevant Provisions
Thirty Year New Zealand Infrastructure Plan 2015	Treasury – National Infrastructure Unit	<ul style="list-style-type: none"> • Vision: In 2045 New Zealand’s infrastructure will be resilient and coordinated and contribute to a strong economy and high living standards. • Purpose: Over the next 30 years New Zealand faces some big infrastructure-related challenges. The purpose of the Plan is to help navigate the way through these challenges and grasp the opportunities they present • Action: The Infrastructure Unit work with local government and private sector infrastructure developers, operators and users throughout New Zealand, while drawing on the advice and perspectives of the National Infrastructure Advisory Board. Government agencies, peak bodies and local authorities will focus on the delivery of their actions within the Plan’s Action Plan. The National Infrastructure Unit monitor implementation and report to the infrastructure community through the publication of an annual State of Infrastructure report which will be publicly available

Government Policy Statement on Land Transport 2018	Ministry of Transport	<p>This Government Policy Statement sets out central Government's policies relevant to transport. The Strategic direction, investment, and funding sources are also set out. The four strategic priorities of the GPS are:</p> <ul style="list-style-type: none"> • Safety: delivering a land transport system free of death and serious injury and a greater focus on investing in safety improvements on high risk state highways and local road, a commitment to deliver a new road safety strategy for improvements in safety outcomes for all road users; • Access: prioritises improving New Zealanders' access to economic and social opportunities and an increased focus on urban areas to ensure that transport and land use planning reduces the need to travel by private motor vehicle; • Environment: prioritises reducing greenhouse gas emissions from transport and supports a mode shift to lower emission forms of transport; • Value for money: taking into account the full range of benefits and costs over the whole life of investments, and be cognisant of possible future changes and uncertainty.
Wellington Regional Land Transport Plan 2015	Greater Wellington Regional Council	<p>The RLTP 2015 sets out the strategic direction for land transport in the Wellington region over the next 10-30 years.</p> <p>It also includes a programme of all the land transport activities in the region that need funding for over the next six years between 2015 and 2021. The Council undertook a mid-year review in 2018 which include an update of the programme of land transport activities.</p>
Regional Road Safety Plan 2009	Greater Wellington Regional Council	<p>The Regional Road Safety Plan seeks to improve the level of regional road safety. This is to be achieved by a safer systems approach with a focus on safer road users, safer roads and roadsides, safer vehicles and safer speeds. The plan includes an action programme aimed at improving the region's road safety outcomes.</p>
Regional Land Transport Programme Network Plan 2015	Greater Wellington Regional Council	<p>The Regional Land Transport Programme Network Plan discusses the strategic role that each transport mode provides in the transport network and sets out key issues and priority areas for improvement.</p>
Regional Cycling Plan 2008	Greater Wellington Regional Council	<p>These plans identify a range of specific actions and initiatives to achieve the outcomes set out in the RLTP. This includes the provision for cyclists and pedestrians and travel demand management through land development activities.</p>
Regional Walking Plan of the RLTP 2016		
Regional Travel Demand Management Plan 2009		

Regional Public Transport Plan 2014	Greater Wellington Regional Council	The Plan sets out a number of policies relating to public transport, with the relevant policies relating to: <ul style="list-style-type: none"> • An integrated approach to the public transport network; • High-quality, reliable, safe, and customer focused public transport services using modern vehicles and infrastructure; and • Providing for the transport disadvantaged. The plan states that the expected capital cost expenditure for public transport for the period 2014-20 was \$344.5 million.
Regional Rail Plan 2010- 2035 (2013 update version)	Greater Wellington Regional Council	The plan addresses the long-term development of Wellington's regional rail network. The plan seeks: <i>a modern, reliable and accessible rail system that competitively moves people and freight in an economic, environmental, integrated and socially sustainable way.</i> The Plan discusses goals, and the proposed works to implement the goals.

4.9 Other relevant legislation or regulations

The following additional legislative / regulatory requirements are also relevant to this topic:

Legislation/ Regulation	Relevant Provisions
Telecommunications Act 2001	Regulates the supply of telecommunications services.
Radiocommunications Act 1989	The primary legislation for managing radio spectrum usage in New Zealand.
Electricity Act 1992	Provides for the regulation, supply and use of electricity in New Zealand, including the health and safety of members of the public, prevention of damage to property.
Local Government 2002	Defines the purpose, roles and responsibilities of local government. Specifies the responsibilities of territorial authorities in relation to land transport matters, including responsibility for local roads, footpaths and street lighting as well as local planning, road-safety works and parking services.
Gas Act 1992	Provides for the regulation, supply and use of gas in New Zealand, and regulates the gas industry, protects the health and safety of members of the public, and promotes the prevention of damage to property in connection with the supply and use of gas.
Land Transport Management Act 2003	The purpose of this Act is to contribute to an effective, efficient and safe land transport system in the public interest. It sets out the requirements for regional land transport plans. The LTMA sets out the planning and funding framework that channels central government funding annually into roading, public transport and traffic safety. Specifically, the legislation: <ul style="list-style-type: none"> • establishes the National Land Transport Fund that funds the NZ Transport Agency (NZTA) and local government to deliver land transport projects and services; • sets out the central and local government transport plans that must

	<p>be followed in order to allocate funds from the National Land Transport Fund to projects and services;</p> <ul style="list-style-type: none"> • establishes the NZTA, which is responsible for allocating the National Land Transport Fund, co-funding local road and public transport activities, and managing the State highway network; • sets out approval regimes for tolling new roads and for public private partnerships; and • sets out the legislative framework for planning and managing public transport, known as the Public Transport Operating Model.
Land Transport Act 1998 (LTA)	The Land Transport Act sets out the legislative framework for land transport regulation and safety, dealing with matters such as driver licensing and offences, penalties, and enforcement powers.
Government Roadway Powers Act 1989	This Act defines the functions and powers of the NZTA and local authorities in relation to motorways and state highways, including the ability to declare and manage access to limited access roads.
Railways Act 2005	This Act includes basic safety obligations of railway operators and the general public when near a railway, as well as the powers the railway operators have to protect and manage the railway corridor.
New Zealand Electrical Code of Practice for Electrical Safe Distances 2001	Sets minimum safe electrical distance requirements for overhead electric line installations and other works associated with the supply of electricity from generating stations to end users. The minimum safe distances have been set primarily to protect persons, property, vehicles and mobile plant from harm or damage from electrical hazards.
Utilities Access Act 2010	Requires utility operators and corridor managers to comply with a national code of practice that regulates access to transport corridors and provides for the making and administration of that code.
National Code of Practice for Utility Operators' Access to Transport Corridors 2019	<p>Sets out the processes and procedures for:</p> <ul style="list-style-type: none"> • Utility operators to exercise right of access to the road corridor for the placement, maintenance, improvement and removal of utility structures; • Corridor Managers to exercise their right to apply reasonable conditions on working in the corridor; and • Managers of railway and motorway corridors to exercise their discretion to grant rights of access to utility operators.
Electricity (Hazards from Trees) Regulations 2003	The purpose of these regulations is to protect the security of the supply of electricity, and the safety of the public, including by prescribing distances from electrical conductors within which trees must not encroach.

5.0 Resource Management Issues Analysis

5.1 Background

Infrastructure is critical to enable people and communities to meet their social, economic and cultural needs. Infrastructure enables everyday activities and provides for the health, wellbeing and safety of people and communities, as well as facilitating benefits at local, regional, national and global scales.

The definition of infrastructure in the RMA is broad², but generally encompasses physical services and facilities such as water supply, sanitation and drainage, transport,

² The definition of Infrastructure in Section 2 of the RMA *infrastructure means (a) pipelines that distribute or transmit natural or manufactured gas, petroleum, biofuel, or geothermal energy; (b) a network for the purpose of telecommunication as defined in section 5 of the Telecommunications Act 2001; (c) a network for the purpose of radiocommunication as defined in section 2(1)*

communications, energy generation and distribution networks, and any other network utilities, which enable society to function. As such, there is a great variety in the size, extent, nature, ownership and function of infrastructure, from linear infrastructure located below ground like stormwater pipes, or above ground like rail lines, to large infrastructure nodes such as airports.

Infrastructure within Wellington City includes networks and facilities which serve functions of local, regional and national importance. The Council owned water, wastewater, stormwater and road network assets provide critical services supporting the health and safety of people and communities of Wellington. The regional water supply pipeline, high pressure natural gas transmission lines, and electricity transmission lines forming part of the National Grid all traverse the City. Likewise, telecommunication networks that provide local, regional, national and international communications are present in the City. The North Island Main Trunk (NIMT) railway line terminates in the city, as does the North Islands southern extent of State Highways 1 and 2.

These networks and facilities are owned and operated by a range of providers, including the Council, Crown agencies, the Greater Wellington Regional Council, State Owned Enterprises, trading enterprises and private companies.

There is likely to be significant infrastructure renewal and development activities in the City in the future. Infrastructure is necessary to support projected growth, and there are known issues with ageing infrastructure, in particular three waters.

In addition, the historic development of the transport network has focused primarily on privately owned vehicles, with less emphasis on public and active transportation. Public transport service levels vary by location served. Significant investment is proposed by the Council to improve cycling and walking routes.

It is therefore important that the development, operation, maintenance and repair, and upgrade of infrastructure necessary for the successful functioning of the City is provided for in an efficient, effective, and timely way. This needs to include recognition of the operational and functional needs of infrastructure networks.

A key matter to be addressed through the PDP is the integration of land use with infrastructure. While infrastructure is a necessity in Wellington City's environs, it can have a range of adverse effects on the environment.

Adverse effects can include those impacting on the amenity of an area, and public health and safety. Poorly designed transport connections can result in safety issues that put users at risk from harm. Visual amenity can be affected by structures associated with infrastructure networks, such as support structures for electricity transmission lines, buildings, poles, overhead wires, pylons, pipes, or antennas. These effects are amplified if the infrastructure is located within areas of high natural character or amenity. Other amenity issues can be generated by infrastructure such as odour from wastewater treatment facilities, or noise from rail and road networks.

of the Radiocommunications Act 1989: (d) facilities for the generation of electricity, lines used or intended to be used to convey electricity, and support structures for lines used or intended to be used to convey electricity, excluding facilities, lines, and support structures if a person— (i) uses them in connection with the generation of electricity for the person's use; and (ii) does not use them to generate any electricity for supply to any other person: (e) a water supply distribution system, including a system for irrigation: (f) a drainage or sewerage system: (g) structures for transport on land by cycleways, rail, roads, walkways, or any other means: (h) facilities for the loading or unloading of cargo or passengers transported on land by any means: (i) an airport as defined in section 2 of the Airport Authorities Act 1966: (j) a navigation installation as defined in section 2 of the Civil Aviation Act 1990: (k) facilities for the loading or unloading of cargo or passengers carried by sea, including a port related commercial undertaking as defined in section 2(1) of the Port Companies Act 1988: (l) anything described as a network utility operation in regulations made for the purposes of the definition of network utility operator in section 166

The operation of infrastructure networks may also have adverse effects on health and safety. This can include risks posed by high voltage electricity lines or high pressure gas transmission lines, if these are damaged by natural events or through the actions of people. Development of infrastructure also has the potential to result in temporary adverse effects, for example as a result of earthworks during construction activities.

Reverse sensitivity issues are of significant concern to infrastructure owners and operators. While infrastructure which has adverse operational effects is generally located away from more sensitive activities, if not appropriately managed, sensitive activities may subsequently establish near to that infrastructure. This can lead to complaints which may result in constraints imposed on the operation of that infrastructure. Managing these reverse sensitivity effects is critical to the ongoing efficient and effective operation of infrastructure networks.

The introduction of new environmental, social and cultural overlays and more detailed natural hazard overlays into the PDP also necessitates a review of the infrastructure chapter to ensure it appropriately integrates with these overlays and the effects of infrastructure on these areas are appropriately managed.

5.2 Evidence Base - Research, Consultation, Information and Analysis undertaken

The Council has reviewed the operative District Plan, commissioned technical advice and assistance from various internal and external experts and utilised this, along with internal workshops and community feedback to assist with setting the plan framework. This work has been used to inform the identification and assessment of the environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions. This advice includes the following:

Title	Author	Brief synopsis
Network Utilities Best Practice Guidance	Network Utilities Group	Industry led guidance on best practice infrastructure resource management. This guidance has been created in order to get more consistent district plan infrastructure provisions throughout the country.
Wellington City Council District Plan Review: Network Utilities – Issues and Options Report	Incite	Incite were engaged to review the operative district plan network utilities provisions, to determine what works well, what the actual and perceived issues are, and what gaps there are in terms of network utilities.

The Council has also gathered the following information and advice that is relevant to this topic:

- Network Utilities Group workshop to ascertain how the rules are working in practice;
- Conversations with consents and monitoring teams to ascertain how the rules are working in practice; and
- Review of resource consents and certificates of compliance issued in relation to infrastructure.

5.2.1 Analysis of Operative District Plan provisions relevant to this topic

The key provisions in the Operative Wellington District Plan are summarised below.

Topic	Summary of relevant provisions
Utilities	<p>There is one utilities objective which seeks to <i>provide for the efficient development and maintenance of utility networks and the activities of other utility operators throughout the city while avoiding, remedying or mitigating any adverse effects of activities on the environment.</i></p> <p>This objective is implemented by a framework of seven supporting policies that:</p> <ul style="list-style-type: none"> • Consider the adverse effects of utility structures, including in sensitivity or highly valued environments; • Consider the operational requirements of utility networks; • Seek utility networks to be located underground where practicable; and • Manage risk from hazards for critical facilities only. <p>Rules and standards set a permitted threshold and expectation for operation, maintenance, repair, upgrade and new network utilities, although certain activities are not permitted in more sensitive zones, to allow for regulation of their effects to occur through a resource consent process.</p> <p>Several key issues have been identified:</p> <ul style="list-style-type: none"> • No recognition of the positive effects of utilities; • No provision for reverse sensitivity effects (as outlined in the RPS); • No specific consideration of regionally significant infrastructure (as outlined in the RPS); • Limited use of natural hazard and resilience provisions (as outlined in the RPS); and • No provision of transport provisions in a standalone chapter.

5.2.2 Analysis of other District Plan provisions relevant to this topic

Current practice has been considered with a review undertaken of the following District Plans. Some of these plans have been prepared in accordance with the National Planning Standards and the NPS-UD.

Plan	Local Authority	Description of approach
Dunedin District Plan	Dunedin City Council	<p>The plan includes a standalone chapter for network utilities which includes rules for overlay areas.³</p> <p>Two objectives address:</p> <ul style="list-style-type: none"> • network utilities' ability to establish, operate and upgrade efficiently and effectively; • minimising adverse effects on zone and overlays / sites/ areas; and • network utilities not being compromised by other activities. <p>The ten relevant policies address:</p> <ul style="list-style-type: none"> • enabling network utilities;

³ The chapter also includes provisions for renewable energy generation, which is addressed in a separate section 32 report

		<ul style="list-style-type: none"> • avoiding or mitigating adverse effects of small scale, underground, internal network utilities on the zone, and effects of large scale to certain other network utilities on amenity • minimising any health and safety risks; • network utility provision in transition zones; • management of effects of earthworks on network utilities; • management of subdivision and activities within the National Grid Corridor and radio transmitters mapped area; <p>Rules address:</p> <ul style="list-style-type: none"> • New, or additions and alterations to existing network utility activities: generally permitted activities in all zones and overlays, other than substations, which are restricted discretionary outside of overlays, or discretionary or non-complying within overlays. • Network utility structures - small scale: generally permitted outside of overlays, and restricted discretionary within overlays; • Network utility structures - large scale: generally discretionary outside of overlays, or discretionary (with additional requirements) or non-complying within overlays. <p>Standards address:</p> <ul style="list-style-type: none"> • Lightspill; • Location; • Scale thresholds (small and large scale); • Poles and masts; • Max volume in particular locations; • Clearance from navigable water bodies; • Setbacks from coast, waterbodies and scheduled trees; • Max height; and • Setback from National Grid and network utilities.
New Plymouth District Plan	New Plymouth District Council	<p>This plan has been prepared in accordance with the National Planning Standards. Strategic direction for Urban Form and Development includes urban environments being adequately serviced by infrastructure.</p> <p>The plan includes a single network utilities chapter within Energy, Infrastructure and Transport, along with Energy and Transport chapters. The chapter incorporates provisions for general and three waters infrastructure, amateur radio, and protecting strategic infrastructure (the</p>

		<p>National Grid and gas transmission pipelines). The chapter largely follows the infrastructure group draft National Planning Standard for network utilities. Additional rules for infrastructure are included in the Overlay chapters.</p> <p>Three objectives relate to:</p> <ul style="list-style-type: none"> • the benefits provided by infrastructure; • the adverse effects of infrastructure; and • reverse sensitivity effects on infrastructure. <p>Eight policies relate to:</p> <ul style="list-style-type: none"> • recognising the benefits of network utilities; • integrating network utilities and land use; • new technologies; • managing the adverse effects of network utilities; • recognising the functional need or operational needs of network utilities; • activities within the National Grid Yard and National Grid Corridor; • set backs from gas transmission pipelines; • minimising reverse sensitivity effects on network utilities <p>Rules are divided into:</p> <ul style="list-style-type: none"> • General • Three waters • Amateur radio • Protecting National Grid • Protecting Gas Transmission Pipelines <p>Each rule contains detailed standards specific to the activity, where relevant. Generally, where permitted activity standards are not complied with these activities become restricted discretionary activities.</p> <p>The general 'effects standards' address:</p> <ul style="list-style-type: none"> • max heights of structures (including poles, towers, antenna on poles); • parking and access; • radio frequency; • electric and magnetic fields; • outdoor lighting; and • noise.
Kāpiti Coast District Plan	Kāpiti Coast District Council	<p>This plan was prepared prior to the National Planning Standards being published, although has been updated to reflect the Planning Standards format.</p> <p>Provisions relating to network utilities are included in a separate section of the plan within the 'Infrastructure, services and associated resource use' chapter, which also includes general infrastructure, service and associated</p>

		<p>resource use policies along with more specific network utility policies. This is a large chapter with a number of sub-sections addressing various matters.</p> <p>The Proposed Kāpiti Coast District Plan Appeals Version 2018 does not include specific objectives for each chapter or topic, but a number of higher-level objectives which cover the entirety of the plan. The objectives that include relevant matters to network utilities include Development management, Strong communities, Access and Transport, and Economic Vitality.</p> <p>A specific objective relating to infrastructure addresses:</p> <ul style="list-style-type: none"> • national, regional and local benefits of infrastructure; • ensuring the efficient development, maintenance and operation of infrastructure; • an adequate level of social and physical infrastructure and services; • meeting the needs of the community and the region; • community resilience; and • avoiding, remedying or mitigating adverse effects on the environment. <p>The plan includes a number of general policies for Infrastructure, Services and Associated Resource Use, and more specific polices for each sub-section.</p> <p>The rules generally provide for network utilities as permitted activities, with specific standards included alongside the rules. Non-compliance with relevant standards generally results in restricted discretionary activity status. Restricted discretionary activity status also applies to network utilities within overlays and natural hazard areas. Controlled activities are limited to subdivision for infrastructure. Discretionary activities include:</p> <ul style="list-style-type: none"> • certain restricted discretionary activities that do not comply with the associated standards; • above ground network utilities within overlays and natural hazard areas not provided for as restricted discretionary activities; and • underground gas transmission pipeline at 2000 kilopascals or greater. <p>Non-complying activities include:</p> <ul style="list-style-type: none"> • non-compliance with radiofrequency or electromagnetic fields standards; and • network utility structures over 13 metres in height within outstanding natural
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		<p>features and landscapes, excluding the National Grid.</p> <p>Standards address:</p> <ul style="list-style-type: none"> • exposure levels for radiofrequency and electric and magnetic fields; • size and location standards for structures; • access to lots created for network utilities. <p>The plan includes a definition of Regionally Significant Infrastructure which includes telecommunications facilities and radio communications facilities, but does not prefix these with 'strategic' as per the RPS definition.</p>
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Transport Network

Plan	Local Authority	Description of approach
Christchurch City Plan	Christchurch City Council	<p>Specific transport chapter. Numerous objectives and policies addressing:</p> <ul style="list-style-type: none"> • an integrated transport network; • a safe and efficient road network; • effects both on the network and from the network; • high trip generating activities; and • the provision of public transport, cycling and walking. <p>Activities that do not comply with transport standards trigger resource consent. Standards included within the chapter.</p>
Hamilton City Plan	Hamilton City Council	<p>Specific transport chapter. One broad objective and policies addressing:</p> <ul style="list-style-type: none"> • an integrated transport network; • a safe and efficient road network; • effects both on the network and from the network; • high trip generating activities; and • the provision of public transport, cycling and walking. <p>Activities that do not comply with transport standards trigger resource consent as restricted discretionary activities; Standards included within the chapter. Technical standards within an appendix. Council's Infrastructure Technical Specifications identified as an "acceptable means of compliance".</p>
Hutt City District Plan	Lower Hutt City Council	<p>Specific transport chapter. Broad objectives and policies addressing:</p> <ul style="list-style-type: none"> • an integrated transport network; • a safe and efficient road network; • effects both on the network and from the network; • high trip generating activities; and

		<ul style="list-style-type: none"> the provision of public transport, cycling and walking. <p>Activities that do not comply with transport standards trigger resource consent.</p> <p>Standards included within the chapter. Technical standards within an appendix. Few references to external standards</p>
Palmerston North District Plan	Palmerston North City Council	<p>Specific transport chapter. Objectives and policies addressing:</p> <ul style="list-style-type: none"> an integrated transport network; a safe and efficient road network; effects both on the network and from the network; high trip generating activities; and the provision of public transport, cycling and walking <p>Activities that do not comply with transport standards trigger resource consent.</p> <p>Standards included within the chapter. Technical standards within an appendix. Few references to external standards.</p>

These plans were selected because:

- They have been subject to a recent plan change or plan review that has addressed similar issues relating to this topic; and
- The associated Councils are of a similar scale to Wellington City and are confronting similar issues relating to this topic.

A summary of the key findings follows

- All of the plans analysed implement national direction and recognise both the effects of, and effects on, infrastructure;
- Objectives and policies generally address similar matters, including providing for infrastructure; recognising the national, regional and local benefits of infrastructure; managing adverse effects; managing reverse sensitivity issues; and technical and operational constraints, but do this to varying degrees and with differences in style;
- The New Plymouth District plan addresses infrastructure in overlays within the relevant Overlays chapters, while the Dunedin City, Kāpiti Coast District and Christchurch City plans address these within the network utilities chapter;
- A permissive approach is generally applied to underground infrastructure, with above ground infrastructure managed in terms of its height, size, location in sensitive or less sensitive environments and potential health and safety effects;
- Underground and smaller scale above ground infrastructure is generally provided for as a permitted activity with non-compliance with relevant standards resulting in restricted discretionary activity status;
- The New Plymouth District, Dunedin City and Christchurch City plans include provisions, including rules, within the network utility chapters for activities in proximity to strategic infrastructure including the National Grid;
- Not meeting radiofrequency, electric, and magnetic field exposure level standards results in non-complying activity status in all plans analysed.

A summary of the key findings for transport networks follows:

- The plans analysed all include a separate transport chapter;
- The plans vary in respect of numbers of transport related objectives, from Hamilton's single city-wide objective to Christchurch's numerous objectives. An integrated transport network is generally a key objective;
- Policies often seek to promote active and public transport;
- Non-compliance with transport standards generally triggers restricted discretionary activity status;
- The plans are generally consistent in terms of technical traffic engineering standards (dimensions, tracking curves, gradients etc.). Christchurch, Hutt City and Palmerston North contain the standards within their respective plan, with little reference to external standards. Hamilton refers to codes of engineering standards.

A more detailed analysis of the provisions of other district plans is provided in the Wellington City Council District Plan Review: Network Utilities – National Comparative Analysis of Planning Frameworks prepared by Incite (6 March 2020).

5.2.3 Advice received from Taranaki Whānui and Ngāti Toa Rangatira

Under Clause 4A of Schedule 1 of the RMA local authorities are required to:

- Provide a copy of any draft policy statement or plan to any iwi authority previously consulted under clause 3 of Schedule 1 prior to notification;
- Allow adequate time and opportunity for those iwi authorities to consider the draft and to supply advice; and
- Have particular regard to any advice received before notifying the plan.

As an extension of this s32(4A) requires evaluation reports prepared in relation to a proposed plan to include a summary of:

- All advice received from iwi authorities concerning the proposal; and
- The response to that advice, including any proposed provisions intended to give effect to the advice.

The District Plan Review has included significant engagement with our mana whenua partners - Taranaki Whānui ki te Upoko o te Ika and Ngāti Toa Rangatira. This has included over 100 hui and wānanga attended by Council officers over the last 12 months. This has provided a much greater understanding of mana whenua values and aspirations as they relate to the PDP.

The PDP elevates the consideration of mana whenua values in resource management processes, including:

1. A new Tangata Whenua chapter which provides context and clarity about who mana whenua are and what environmental outcomes they are seeking.
2. A new Sites and Areas of Significance to Māori chapter that provides greater protection for sites and areas of significance than the current District Plan.
3. Integrating mana whenua values across the remainder of the plan where relevant.

This is consistent with both the City Goal of ‘Partnership with mana whenua’ in the Spatial Plan; and the recently signed Tākai Here (2022), which is the new partnership agreement between the Council and our mana whenua partners, Rūnanga o Toa Rangatira, Taranaki Whānui ki Te Upoko o Te Ika and Te Rūnanganui o Te Āti Awa.

A full copy of the advice received is attached as an addendum to the complete suite of Section 32 reports as Appendix 5 – Advice received from Taranaki Whānui and Ngāti Toa Rangatira.

No specific advice has been received from Taranaki Whānui or Ngāti Toa Rangatira regarding this topic and the proposed provisions evaluated within this report.

5.2.4 Consultation undertaken to date

The following is a summary of the primary consultation undertaken in respect of infrastructure:

Who	What	When	Relevant Issues Raised
Infrastructure providers	Workshop evaluating operative district plan, including gap analysis	February 2020	<ul style="list-style-type: none"> • Outdated definitions and terminology; • Limited provision for linear projects crossing multiple sites and zones; • Onerous heritage rules; • Confusing contaminated land provisions; • No reverse sensitivity provisions
Feedback on Draft Plan	Feedback on Draft Plan, through submissions and targeted discussions	December 2021	<ul style="list-style-type: none"> • General support for approach, but differing views on what should be permitted or require resource consent.

A summary of specific feedback on this topic received during consultation on the Draft District Plan is contained in Appendix 2, including how it has been responded to in the PDP. Additional detail concerning the wider consultation undertaken in preparing the PDP is contained in the companion Section 32 Evaluation Overview Report.

In summary, the key findings arising from the consultation undertaken is that the Draft District Plan (and now the Proposed District Plan) addresses the gaps identified in the operative district plan, with the key matters in dispute being the thresholds between what should be permitted and what should require resource consent.

5.3 Summary of Relevant Resource Management Issues

Based on the research, analysis and consultation outlined above the following issues have been identified:

Issue	Comment	Response
<p>Issue 1: Recognising the benefits of infrastructure in enabling social, economic and cultural wellbeing.</p>	<p>Infrastructure provides essential services to people’s homes and businesses, and is critical for the health, safety, and wellbeing of people and communities.</p> <p>The benefits of infrastructure may be realised at national, regional or local scales, while adverse effects are generally experienced at more local scales. This can create a tension in providing for necessary infrastructure while avoiding, remedying or mitigating adverse effects.</p> <p>Not including specific objectives and policies addressing the benefits of infrastructure may not provide decision makers with sufficient guidance on providing for infrastructure.</p> <p>The RPS requires that district plans include policies and/or methods that recognise the benefits of regionally significant infrastructure.</p>	<ul style="list-style-type: none"> • Provide for infrastructure by introducing a standalone chapter which contains all provisions relevant to infrastructure. • Include an objective and supporting policies to recognise the benefits of infrastructure. • Include rules providing for appropriate infrastructure which meet relevant standards as permitted activities, with non-compliance with standards generally resulting in restricted discretionary activity status where appropriate.
<p>Issue 2: The transport network needs to enable the efficient and safe movement of people and goods within and beyond the City.</p>	<p>A safe and efficient transport network is essential for community wellbeing, enabling economic activity, and having a connected and accessible City.</p> <p>Integration of the transport network with land use development patterns is essential to achieve an efficient and effective transport system and urban form.</p> <p>The transport network needs to provide for all users and transport modes to enable efficient and effective transportation and meet people’s health and wellbeing.</p> <p>The RPS requires that district plans include policies and/or</p>	<ul style="list-style-type: none"> • Include a specific objective and supporting policies addressing the transport network. • Include rules enabling the development of facilities for public and active transportation, and the maintenance and repair of the road network. • Include rules providing for the development and upgrade of the road network. • Include standards for the road network to ensure it is safe, provides connectivity to land uses and provides for all transport modes.

	<p>methods that recognise the benefits for people, and for goods being able to travel to, from, and around the region efficiently and safely; and to promote travel demand management mechanisms. Particular regard must also be given to achieving the region's urban design principles and certain matters in making progress towards achieving the key outcomes of the Wellington Regional Land Transport Strategy.</p>	
<p>Issue 3: The development, use, operation, repair, maintenance, upgrade, relocation, and removal of infrastructure can result in adverse effects on the environment.</p>	<p>Infrastructure can have adverse effects on the environment that need to be managed. Adverse effects include short-term effects during construction, maintenance and repair, and removal and longer-term effects during operation, including noise, vibration, and visual effects.</p> <p>Of particular concern is the effects of above ground infrastructure on amenity values.</p> <p>The adverse effects of infrastructure may not always be able to be avoided, remedied or mitigated. Residual adverse effects need to be weighed against the benefits of the infrastructure to people and communities.</p> <p>The effects of construction, and ongoing effects of operation, maintenance, repair and removal of infrastructure, including cumulative effects, can be reduced or contained by co-location, and the use of roads as infrastructure corridors.</p>	<ul style="list-style-type: none"> • Include an objective and supporting policies that seek to avoid, remedy, or mitigate adverse effects of infrastructure. • Include rules requiring resource consents for infrastructure which may have adverse effects on the environment.

<p>Issue 4: Adverse effects on the environment from infrastructure can be less acceptable in areas or sites with identified significant values.</p>	<p>The PDP includes a range of overlays identifying sites and areas within the city with significant values to people and communities. These respond to requirements set out in national direction and regional policies.</p> <p>The development, operation, use, maintenance, repair and removal of infrastructure has the potential to have adverse effects on these areas. While these effects may be acceptable outside of overlays, the values of the sites and areas may result in these effects not being appropriate within the respective overlays.</p> <p>As a standalone chapter, the provisions need to recognise and protect these sites and areas from inappropriate use and development for infrastructure purposes.</p> <p>Generally, the needs of existing infrastructure located within overlays should be enabled where those activities do not further impact on the values of the relevant overlay.</p> <p>The most efficient method to understand how infrastructure should be managed in overlays is through the provision of subchapters</p>	<ul style="list-style-type: none"> • Include subchapters with specific objectives to protect the values and qualities of any Overlay. • Include separate policies in subchapters addressing the operation, maintenance, repair, upgrading and development of new infrastructure within each overlay, or relevant groups of overlays. • Include within subchapters policies providing for the upgrading and development of the National Grid aligning with the NESETA. • Include in subchapters a rule framework that differentiates activities based on location within an overlay to those outside of overlays. • Provide for operation, maintenance and repair and removal of existing infrastructure, and upgrading of infrastructure within overlays as permitted activities where relevant standards are met.
<p>Issue 5: The efficient and effective use, operation, repair, maintenance, upgrade, relocation, and removal of infrastructure</p>	<p>Inappropriate subdivision, use, and development, including intensification of activities, in the vicinity of infrastructure can have reverse sensitivity effects which result in constraints on the operation and use of the infrastructure. This may result in adverse effects on the effective and efficient operation of that infrastructure, and consequently</p>	<ul style="list-style-type: none"> • Include a specific objective and supporting policies addressing the need to protect Infrastructure from adverse effects of other activities. • Include rules for earthworks in the National Grid Yard within the earthworks chapter. • Include provisions within the Subdivision chapter:

<p>can be constrained or compromised by other activities.</p>	<p>the local, regional and national benefits derived from it.</p> <p>The RPS requires that district plans include policies and rules that protect regionally significant infrastructure from incompatible new subdivision, use and development.</p>	<ul style="list-style-type: none"> ○ an objective addressing regionally significant infrastructure not being compromised; ○ a policy on avoidance of effects on infrastructure; ○ matters of control and discretion addressing regionally significant infrastructure. <ul style="list-style-type: none"> ● Include rules within the relevant zone chapters for activities, buildings and structures within the National Grid Yard and Gas Transmission Pipeline Corridor. ● Require through noise chapter provisions that noise-sensitive activities are protected from noise generated by state highways and railways.
<p>Issue 6: Recognising the functional and operational needs of infrastructure.</p>	<p>Different types of infrastructure have differing functional and operational needs, which need to be recognised and provided for through the PDP provisions and resource consent decision making.</p> <p>This may be a result of physical or technical characteristics of the infrastructure, for example the need for drainage infrastructure to reflect the topography of the serviced areas, or other factors such as regulatory requirements.</p> <p>Additionally, new technology may be available which has benefits to efficiency or effectiveness of infrastructure, but which may have its own operational or functional needs.</p>	<ul style="list-style-type: none"> ● Include an objective which addresses the need to recognise the operational and functional needs of infrastructure. ● Recognise the operational and functional needs of infrastructure through a separate policy which includes matters for decision makers to have regard to. ● Include a separate policy recognising the potential benefits of the application of new technology to infrastructure provision. ● Include within relevant policies recognition of operational and function needs of the National Grid. ● Include within policies providing for other infrastructure outside of overlays, consideration of operational and functional needs for its location. ● Include consideration of operational and functional needs for the location of infrastructure within policies addressing infrastructure with overlays.
<p>Issue 7: Coordination of existing</p>	<p>A lack of coordination between infrastructure and land use development patterns can result</p>	<ul style="list-style-type: none"> ● The Infrastructure chapter enables appropriate infrastructure required to support land use development to be

development and planned growth.	<p>in inefficient provision and use of infrastructure, or a lack of sufficient development capacity within the City.</p> <p>The NPSUD requires that local authorities to provide sufficient development capacity to meet the projected demand for housing and business growth. Council won't meet its commitments if infrastructure is not provided in a co-ordinated manner.</p>	<p>provided in an efficient and effective manner.</p> <ul style="list-style-type: none"> • Include an objective and supporting policies directing the integration of land development and infrastructure.
Issue 8: Control the effects of amateur radio configurations	<p>Amateur radio can be a useful source of communication resilience. However, it can lead to adverse effects.</p>	<ul style="list-style-type: none"> • Include provisions that recognise amateur radio configurations and the need to manage actual and potential environmental effects.

6.0 Evaluation of the Proposal

This section of the report evaluates the objectives of the proposal to determine whether they are the most appropriate means to achieve the purpose of the RMA, as well as the associated policies, rules and standards relative to these objectives. It also assesses the level of detail required for the purposes of this evaluation, including the nature and extent to which the benefits and costs of the proposal have been quantified.

6.1 Scale and Significance

Section 32(1)(c) of the RMA requires that this report contain a level of detail that corresponds with the scale and significance of the environmental, economic, social and cultural effects that are anticipated from the implementation of the proposal.

The level of detail undertaken for this evaluation has been determined by assessing the scale and significance of the environmental, economic, social and cultural effects anticipated through introducing and implementing the proposed provisions (i.e. objectives, policies and rules) relative to a series of key criteria.

Based on this the scale and significance of anticipated effects associated with this proposal are identified below:

Criteria	Scale/Significance			Comment
	Low	Medium	High	
Basis for change		✓		<ul style="list-style-type: none"> • Council is undertaking a full District Plan review. • The operative district plan utility provisions have not been updated since some regional and national direction has come into force.

Criteria	Scale/Significance			Comment
	Low	Medium	High	
Addresses a resource management issue		✓		<ul style="list-style-type: none"> • Infrastructure has a range of social, economic, and cultural benefits and is critical to the health and wellbeing of people and communities, and therefore must be provided for in an efficient and effective manner. • Infrastructure also has the potential to have a wide range of adverse effects on the environment due to the potential size and scale of structures associated with infrastructure, and effects specific to different types of infrastructure such as electric and magnetic field and radiofrequency emissions.
Degree of shift from the status quo		✓		<ul style="list-style-type: none"> • The operative district plan infrastructure provisions have been evaluated as not being comprehensive and not directly aligning with recent regional and national statutory planning documents. Consequently, a shift from the status quo is necessary. However, those matters that are included in the operative district plan also remain relevant.
Who and how many will be affected/ geographical scale of effect/s		✓		<ul style="list-style-type: none"> • All people and communities within Wellington City rely to some degree on services provided by infrastructure. The efficient and effective provision, operation, use, maintenance, upgrading and renewal of infrastructure therefore affects all people and communities within Wellington. • There are a range of public and private providers of infrastructure who will be affected by the district plan provisions for development, operation, use, maintenance, upgrading and renewal of infrastructure. • By its nature, infrastructure has extensive geographic range, particularly linear infrastructure such as roads, water infrastructure, and transmission of electricity. Infrastructure can have operational and functional requirements

Criteria	Scale/Significance			Comment
	Low	Medium	High	
				to be located in various environments of the City.
Degree of impact on or interest from iwi/Māori		✓		<ul style="list-style-type: none"> Infrastructure has the potential to adversely affect sites and areas of significance to Māori through development, use, operation, maintenance, upgrading and renewal activities.
Timing and duration of effect/s		✓		<ul style="list-style-type: none"> The effects of the PDP will be ongoing from the time any of its provisions become operative. There will be intermittent proposals for development, operation, maintenance, renewal and upgrade of infrastructure. Construction effects of the development of infrastructure will be temporary and intermittent. Infrastructure generally has relatively long life-cycles before renewal or removal. The effects of any new or upgraded infrastructure will therefore be long term.
Type of effect/s		✓		<ul style="list-style-type: none"> The development, operation, use, maintenance, upgrading and renewal of infrastructure can have significant adverse effects on the environment, particularly effects on amenity as a result of noise emissions, and visual dominance of relatively large, prominent structures. They may also have potential or perceived adverse effects on public health and safety. Different types of effects can be generated during development and operation of infrastructure. Adverse effects during development of infrastructure can include construction noise, traffic and effects from earthworks. Ongoing effects can include visual dominance of large structures, noise, and effects generated during maintenance works. It might not always be possible to avoid, remedy or mitigate all adverse effects from infrastructure.

Criteria	Scale/Significance			Comment
	Low	Medium	High	
				<ul style="list-style-type: none"> The extent and scale of these effects is highly dependent on the type, nature, and location of the infrastructure. Linear, undergrounded infrastructure within an urban environment may have effects but be largely unnoticed by most people during operation. Infrastructure involving large, visually prominent structures have the potential to have greater effects, particularly in more sensitive areas.
Degree of risk and uncertainty	✓			<ul style="list-style-type: none"> The degree of risk and uncertainty is low given the well-understood potential effects, and the approach taken for their management in the proposed provisions.

Overall, for the reasons outlined in the table above, the scale and significance of the proposed provisions are considered to be medium.

Consequently, a high level evaluation of these provisions has been identified as appropriate for the purposes of this report.

6.2 Quantification of Benefits and Costs

Section 32(2)(b) requires that, where practicable, the benefits and costs of a proposal are to be quantified.

Specific quantification of the benefits and costs beyond the information and evidence outlined in section 5.2 of this report is neither practicable nor readily available. However, a qualitative assessment of identifiable costs and benefits associated with this proposal is provided below and, where relevant, in the assessment of policies, rules and other methods contained in section 11 of this report.

7.0 Overview of Proposal/s

The proposed provisions relevant to this topic are set out in detail in the ePlan and should be referenced to in conjunction with this evaluation report.

In summary, the proposed provisions include

- Definitions
 - A set of relevant definitions, including:
 - Additional Infrastructure;
 - Ancillary Transport Network Infrastructure;
 - Cabinet;
 - Customer Connection;
 - Development Infrastructure;
 - Functional Need;
 - Infrastructure;
 - National Grid;
 - National Grid Subdivision Corridor;

- National Grid Yard;
 - Network Utility Operator;
 - Operational Need;
 - Radiocommunication;
 - Regionally Significant Infrastructure;
 - Telecommunication; And
 - Upgrading.
- Six objectives that address:
 - The benefits of infrastructure;
 - Adverse effects of infrastructure;
 - Adverse effects on infrastructure;
 - Infrastructure availability;
 - Transport network; and
 - Amateur radio configurations.
- Thirteen policies that provide for:
 - Recognition and provision of infrastructure;
 - Co-ordination of infrastructure with land use, subdivision, development and urban growth;
 - Technological advances;
 - Undergrounding of infrastructure;
 - Adverse effects of infrastructure;
 - The consideration of the adverse effects of infrastructure;
 - Reverse sensitivity;
 - Amateur radio configurations;
 - Upgrading and development of the transport network;
 - Classification of roads;
 - Connections to roads;
 - Infrastructure within roads; and
 - Infrastructure within riparian margins
- A rule framework that manages infrastructure activities as follows:
 - Permits the operation, maintenance and development of most infrastructure, subject to compliance with standards;
 - Provides for infrastructure which does not comply with standards or higher order planning documents as either controlled or restricted discretionary activities (unless potential effects are significantly adverse, in which case non-complying activity status is used);
 - Provide restricted discretionary or discretionary activity status where it is considered effects from certain infrastructure need to be assessed on a case by case basis
- A complementary set of effects standards that address:
 - Health and safety;
 - Earthworks;
 - Upgrading;
 - Riparian setbacks;
 - Reverse sensitivity;
 - Design parameters and size;

8.0 Evaluation of Proposed Objective/s

8.1 Introduction

Section 32(1)(a) of the RMA requires that the evaluation report examine the extent to which the objectives of the proposal are the most appropriate way to promote the sustainable management of natural and physical resources.

An examination of the proposed objectives along with reasonable alternatives is included below, with the relative extent of their appropriateness based on an assessment against the following criteria:

1. Relevance (i.e. Is the objective related to addressing resource management issues and will it achieve one or more aspects of the purpose and principles of the RMA?)
2. Usefulness (i.e. Will the objective guide decision-making? Does it meet sound principles for writing objectives (i.e. does it clearly state the anticipated outcome?)
3. Reasonableness (i.e. What is the extent of the regulatory impact imposed on individuals, businesses or the wider community? Is it consistent with identified tangata whenua and community outcomes?)
4. Achievability (i.e. Can the objective be achieved with tools and resources available, or likely to be available, to the Council?)

8.2 Evaluation of Objectives

While not specifically required under s32, it is appropriate to also consider alternative objectives to those currently included in the PDP, so as to ensure that the proposed objective(s) are the most appropriate to achieve the purpose of the RMA.

For the purposes of this evaluation, the Council has considered two potential objectives:

1. The proposed objectives
2. The current most relevant objective - the status quo

Proposed objective INF-O1 – The benefits of infrastructure:		
The national, regional and local benefits of infrastructure are recognised and provided for.		
General intent:		
Ensure that the benefits of infrastructure are recognised.		
Other potential objectives		
Status quo: Objective 22.2.1 To provide for the efficient development and maintenance of utility networks and the activities of other utility operators throughout the city while avoiding, remedying or mitigating any adverse effects of activities on the environment.		
	Preferred objective	Status quo
<i>Relevance:</i>		
Addresses a relevant resource management issue	Yes – the proposed objective addresses Issue 1 and 6	Yes, the status quo objective addresses Issue 1, 3, 4, 6 and 7.
Assists the Council to undertake its functions under s31 RMA	Yes – Consistent with s31(1)(a), the management of the effects of use, development or protection of land and associated natural and physical resources.	Yes – Consistent with s31(1)(a), the management of the effects of use, development or protection of land and associated natural and physical resources.
Gives effect to higher level documents	<p>Yes – The proposed objective gives direct effect to Objective 10 and Policy 7 of the RPS. As the definition of Infrastructure in the PDP includes the National Grid, the proposed objectives also gives effect to Policy 1 and 10 of the NPS-ET.</p> <p>The proposed objective is considered to be consistent with the purpose and principles of the RMA, as they assist in enabling people and communities to provide for their social and economic well-being and for their health and safety. Specifically, they are considered to be consistent with clause 5(2)(a) of the RMA, as they assist in sustaining the potential of Regionally Significant Infrastructure, being physical resources, to meet the reasonably foreseeable needs of future generations. They are also consistent with section 7(b) as they</p>	Yes – The current objective gives effect to Objective 10 and Policy 7 of the RPS. However, this is in the context of network utilities, rather than the slightly wider context of infrastructure.

	assist in avoiding the inefficient use and development of infrastructure resources.	
Usefulness:		
Guides decision-making	Yes – The objectives provide clarity of what is to be achieved in relation to managing Infrastructure when considering resource consent applications under s104.	Yes – The objectives provide clarity of what is to be achieved in relation to managing Infrastructure when considering resource consent applications under s104. However, the provisions are not as detailed and therefore not considered to be as useful as the proposed provisions.
Meets best practice for objectives	Yes – The objective clearly articulates an outcome and is drafted in plain English and active language.	Yes – The objective clearly articulates an outcome and is drafted in plain English and active language.
Reasonableness:		
Will not impose unjustifiably high costs on the community/parts of the community	Yes – The objectives do not create unjustifiably high costs on the community. Overall, the proposed objectives will likely have a positive benefit in terms of long-term financial costs to the community through protecting the effectiveness and efficiency of Regionally Significant Infrastructure which generally has high capital costs.	Yes – The objective does not create unjustifiably high costs on the community. Similar to the proposed objectives, it likely provides positive benefits to the community overall.
Acceptable level of uncertainty and risk	Yes – The inclusion of provisions to recognise in particular Regionally Significant Infrastructure is identified in the RPS as a requirement for district plans, and therefore has been well communicated with the community, and the proposed objectives generally build on the existing objective in the operative plan.	Yes – the objective is clear in its intended enablement of infrastructure, provided effects are managed.
Achievability:		
Consistent with identified tangata whenua and community outcomes	Yes - The proposed objective is consistent with the strategic directions.	Yes - The proposed objective is consistent with the strategic directions.
Realistically able to be achieved within the Council's powers, skills and resources	Yes – The approach is well understood and within Council's statutory powers. The objectives are realistically able to be achieved based on the Council's responsibilities under	Yes – The status quo is currently being implemented within Council's powers, skills and resources.

	the RMA. The greater certainty of provisions assists with matching skills and resources.	
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Summary		
The above analysis indicates that the preferred objective and the status quo both achieve the purpose of the RMA.		

Proposed objective INF-O2 – The adverse effects of infrastructure:
The adverse effects of infrastructure on the environment are managed, while recognising:
<ol style="list-style-type: none"> 1. The functional and operational need of infrastructure; and 2. That positive effects of infrastructure may be realised locally, regionally or nationally.

General intent:
Ensure that the adverse effects of infrastructure are managed, while recognising the functional and operational need of infrastructure, and the positive effects.

Other potential objectives
Status quo: Objective 22.2.1 To provide for the efficient development and maintenance of utility networks and the activities of other utility operators throughout the city while avoiding, remedying or mitigating any adverse effects of activities on the environment.

	Preferred objective	Status quo
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Relevance:		
Addresses a relevant resource management issue	Yes – the proposed objective addresses Issues 3 and 4	Yes, the status quo objective addresses Issue 1, 3, 4, 6 and 7.
Assists the Council to undertake its functions under s31 RMA	Yes – Consistent with s31(1)(a), the management of the effects of use, development or protection of land and associated natural and physical resources.	Yes – Consistent with s31(1)(a), the management of the effects of use, development or protection of land and associated natural and physical resources.
Gives effect to higher level documents	Yes – The proposed objective gives direct effect to Objective 10 and Policy 7 of the RPS. As the definition of Infrastructure in the PDP includes the National Grid, the proposed objectives also give effect to Policy 1 and 10 of the NPS-ET.	Yes – The current objective gives effect to Objective 10 and Policy 7 of the RPS. However, this is in the context of network utilities, rather than the slightly wider context of infrastructure.

	The proposed objective is considered to be consistent with the purpose and principles of the RMA, as they assist in enabling people and communities to provide for their social and economic well-being and for their health and safety. Specifically, they are considered to be consistent with clause 5(2)(a) of the RMA, as they assist in sustaining the potential of Regionally Significant Infrastructure, being physical resources, to meet the reasonably foreseeable needs of future generations. They are also consistent with section 7(b) as they assist in avoiding the inefficient use and development of infrastructure resources.	
Usefulness:		
Guides decision-making	Yes – The objectives provide clarity of what is to be achieved in relation to managing the effects of infrastructure when considering resource consent applications under s104.	Yes – The objectives provide clarity of what is to be achieved in relation to managing the effects of infrastructure when considering resource consent applications under s104.
Meets best practice for objectives	Yes – The objective clearly articulates an outcome and is drafted in plain English and active language.	Yes – The objective clearly articulates an outcome and is drafted in plain English and active language.
Reasonableness:		
Will not impose unjustifiably high costs on the community/parts of the community	Yes – The objectives do not create unjustifiably high costs on the community. Overall, the proposed objectives will likely have a positive benefit in terms of long-term financial costs to the community through protecting the effectiveness and efficiency of Regionally Significant Infrastructure which generally has high capital costs.	Yes – The objective does not create unjustifiably high costs on the community. Similar to the proposed objectives, it likely provides positive benefits to the community overall.
Acceptable level of uncertainty and risk	Yes – The inclusion of provisions to recognise in particular Regionally Significant Infrastructure is identified in the RPS as a requirement for district plans, and therefore has been well communicated with the community, and the	Yes – the objective is clear in its intended enablement of infrastructure, provided effects are managed.

	proposed objectives generally build on the existing objective in the operative plan.	
Achievability:		
Consistent with identified tangata whenua and community outcomes	Yes - The proposed objective is consistent with the strategic directions.	Yes - The proposed objective is consistent with the strategic directions.
Realistically able to be achieved within the Council's powers, skills and resources	Yes – The approach is well understood and within Council's statutory powers. The objectives are realistically able to be achieved based on the Council's responsibilities under the RMA. The greater certainty of provisions assists with matching skills and resources.	Yes – The status quo is currently being implemented within Council's powers, skills, and resources.
Summary		
The above analysis indicates that the preferred objective and the status quo both achieve the purpose of the RMA.		

Proposed objective INF-O3 – Adverse effects on infrastructure		
Manage the adverse effects, including reverse sensitivity effects or subdivision use and development on the function and operation of infrastructure.		
General intent:		
Ensure that infrastructure is protected from the adverse effect of land use, subdivision, and development.		
Other potential objectives		
Status quo: Objective 22.2.1 To provide for the efficient development and maintenance of utility networks and the activities of other utility operators throughout the city while avoiding, remedying or mitigating any adverse effects of activities on the environment.		
	Preferred objective	Status quo
Relevance:		
Addresses a relevant resource management issue	Yes – the proposed objective addresses Issue 5	No, the status quo does not address Issue 6.
Assists the Council to undertake its functions under s31 RMA	Yes – Consistent with s31(1)(a), the management of the effects of use, development or protection of land and associated natural and physical resources.	No – the status quo does not allow for the management of the effects of use, development or protection of land and associated natural and physical resources on infrastructure.

Gives effect to higher level documents	Yes – The proposed objective gives direct effect to Objective 10 and Policy 8 of the RPS. The proposed objective is considered to be consistent with the purpose and principles of the RMA, as they assist in enabling people and communities to provide for their social and economic well-being and for their health and safety. Specifically, they are considered to be consistent with clause 5(2)(a) of the RMA, as they assist in sustaining the potential of Regionally Significant Infrastructure, being physical resources, to meet the reasonably foreseeable needs of future generations. They are also consistent with section 7(b) as they assist in avoiding the inefficient use and development of infrastructure resources.	No – The current objective does not give effect to Objective 10 and Policy 8 of the RPS.
Usefulness:		
Guides decision-making	Yes – The objective provide clarity of what is to be achieved in relation to managing Infrastructure when considering resource consent applications under s104.	No – The objective does not provide clarity of what is to be achieved in relation to managing adverse effects on infrastructure when considering resource consent applications under s104.
Meets best practice for objectives	Yes – The objective clearly articulates an outcome and is drafted in plain English and active language.	Yes – The objective clearly articulates an outcome and is drafted in plain English and active language.
Reasonableness:		
Will not impose unjustifiably high costs on the community/parts of the community	Yes – The objectives do not create unjustifiably high costs on the community. Overall, the proposed objectives will likely have a positive benefit in terms of long-term financial costs to the community through protecting the effectiveness and efficiency of Regionally Significant Infrastructure which generally has high capital costs.	Yes – The objective does not create unjustifiably high costs on the community. However reverse sensitivity can create costs on infrastructure providers.
Acceptable level of uncertainty and risk	Yes – The inclusion of provisions to recognise and protect Regionally Significant Infrastructure is identified in the RPS as a requirement for	No – there is uncertainty to infrastructure providers that their assets may compromised by other land uses, subdivision or development.

	district plans, and therefore has been well communicated with the community, and the proposed objectives generally build on the existing objective in the operative plan.	
Achievability:		
Consistent with identified tangata whenua and community outcomes	Yes - The proposed objective is consistent with the strategic directions	Yes - The proposed objective is consistent with the strategic directions
Realistically able to be achieved within the Council's powers, skills, and resources	Yes – The approach is well understood and within Council's statutory powers. The objectives are realistically able to be achieved based on the Council's responsibilities under the RMA. The greater certainty of provisions assists with matching skills and resources.	Yes – The status quo is currently being implemented within Council's powers, skills, and resources.
Summary		
The above analysis indicates that the preferred objective achieves the purpose of the RMA. The status quo does not give effect to the RPS.		

Proposed objective INF-O4 – Infrastructure availability		
Safe, effective, and resilient infrastructure is available for, and integrated with, existing and planned subdivision, use and development.		
General intent:		
Ensure that the land use, subdivision, and development is integrated with infrastructure		
Other potential objectives		
Status quo: Objective 22.2.1 To provide for the efficient development and maintenance of utility networks and the activities of other utility operators throughout the city while avoiding, remedying, or mitigating any adverse effects of activities on the environment.		
	Preferred objective	Status quo
Relevance:		
Addresses a relevant resource management issue	Yes – the proposed objective addresses Issue 7	No – the existing objective does not consider integration of infrastructure and development.
Assists the Council to undertake its functions under s31 RMA	Yes – Consistent with s31(1)(a), the management of the effects of use, development	Yes – Consistent with s31(1)(a), the management of the effects of use, development or protection of land and associated natural and physical resources.

	or protection of land and associated natural and physical resources.	
Gives effect to higher level documents	Yes – The proposed objective gives direct effect to Objective 10 and Policy 7 of the RPS, as well as Objective 6 and Policy 10 of the NPSUD.	No – the existing objective does not consider integration of infrastructure and development as required by the RPS and NPSUD.
Usefulness:		
Guides decision-making	Yes – The objectives provide clarity of what is to be achieved in relation to managing Infrastructure when considering resource consent applications under s104.	Neutral – The objectives provide clarity of what is to be achieved in relation to managing Infrastructure when considering resource consent applications under s104, but does not require specific consideration of integration.
Meets best practice for objectives	Yes – The objective clearly articulates an outcome and is drafted in plain English and active language.	Yes – The objective clearly articulates an outcome and is drafted in plain English and active language.
Reasonableness:		
Will not impose unjustifiably high costs on the community/parts of the community	Yes – The objectives do not create unjustifiably high costs on the community. Overall, the proposed objectives will likely have a positive benefit in terms of long-term financial costs to the community through ensuring development and infrastructure is integrated	Yes – The objective does not create unjustifiably high costs on the community. Similar to the proposed objectives, it likely provides positive benefits to the community overall.
Acceptable level of uncertainty and risk	Yes – The inclusion of provisions to recognise integrate development and infrastructure as identified in the RPS and NPSUD as a requirement for district plans, and therefore has been well communicated with the community, and the proposed objectives generally build on the existing objective in the operative plan.	Neutral – the objective is clear in its intended enablement of infrastructure, provided effects are managed, but it does not require integration of development with infrastructure.
Achievability:		
Consistent with identified tangata whenua and community outcomes	Yes - The proposed objective is consistent with the strategic directions	Yes - The proposed objective is consistent with the strategic directions
Realistically able to be achieved within the Council's powers, skills, and resources	Yes – The approach is well understood and within Council's statutory powers. The objectives are realistically able to be achieved based on the Council's responsibilities under	Yes – The status quo is currently being implemented within Council's powers, skills, and resources.

	the RMA. The greater certainty of provisions assists with matching skills and resources.	
Summary		
The above analysis indicates that the preferred objective more overtly achieves the purpose of the RMA than the status quo.		

Proposed objective INF-O5 – Transport Network		
The transport network:		
<ol style="list-style-type: none"> 1. Improves connectivity, enabling people of all ages and abilities, and goods to move safely and effectively regardless of transport mode; 2. Supports well-functioning urban environments; 3. Supports the health and well-being of people; and 4. Supports development infrastructure, additional infrastructure and green infrastructure. 		
General intent:		
Ensure that the transport network provides for safe connectivity, supports well functioning urban environments, health and wellbeing, and development.		
Other potential objectives		
Status quo: no objective		
	Preferred objective	Status quo
<i>Relevance:</i>		
Addresses a relevant resource management issue	Yes – the proposed objective addresses Issue 2	No – transport is not provided for at a District Wide level in the Operative District Plan.
Assists the Council to undertake its functions under s31 RMA	Yes – Consistent with s31(1)(a), the management of the effects of use, development or protection of land and associated natural and physical resources.	The existing objective is less well aligned with the functions of the Council under s31(1)(a) as the outcome expressed does not address the integration of development with the transport network.
Gives effect to higher level documents	Yes – The proposed objective gives direct effect to Objective 22 and Policies 33, 55 and 57 of the RPS, as well as Objective 3 and Policy 1 of the NPSUD.	No – the current Plan does not give effect to higher level documents.

Usefulness:		
Guides decision-making	Yes – The objectives provide clarity of what is to be achieved in relation to managing Infrastructure when considering resource consent applications under s104.	There is no objective to guide decision making.
Meets best practice for objectives	Yes – The objective clearly articulates an outcome and is drafted in plain English and active language.	
Reasonableness:		
Will not impose unjustifiably high costs on the community/parts of the community	Yes – The objectives do not create unjustifiably high costs on the community. Overall, the proposed objectives will likely have a positive benefit in terms of long-term financial costs to the community through protecting the effectiveness and efficiency of Regionally Significant Infrastructure which generally has high capital costs.	Not providing an objective could result in unnecessary costs on the community through a lack of integration with the transport network.
Acceptable level of uncertainty and risk	Yes – The inclusion of provisions integrate transport and land use is identified in the RPS as a requirement for district plans, and therefore has been well communicated with the community, and the proposed objectives generally build on the existing objective in the operative plan.	Not having an objective results in uncertainty and risk
Achievability:		
Consistent with identified tangata whenua and community outcomes	Yes - The proposed objective is consistent with the strategic directions	No objective is inconsistent with the strategic directions
Realistically able to be achieved within the Council's powers, skills and resources	Yes – The approach is well understood and within Council's statutory powers. The objectives are realistically able to be achieved based on the Council's responsibilities under the RMA. The greater certainty of provisions assists with matching skills and resources.	Yes – The status quo is currently being implemented within Council's powers, skills and resources.
Summary		
The above analysis indicates that the preferred objective achieves the purpose of the RMA. This is not achieved by the Operative Plan.		

Proposed objective INF-O6 – Amateur radio configurations		
The adverse effects of amateur radio configurations on the environment are managed.		
General intent:		
The adverse effects of amateur radio configurations on the environment are managed.		
Other potential objectives		
Status quo: No objective		
	Preferred objective	Status quo
Relevance:		
Addresses a relevant resource management issue	Yes – the proposed objective addresses Issue 8	No, there is no objective in the operative District Plan which provides for Amateur Radio Configurations
Assists the Council to undertake its functions under s31 RMA	Yes – Consistent with s31(1)(a), the management of the effects of use, development or protection of land and associated natural and physical resources.	There is no explicit existing objective for amateur radio. It falls under the general objective for network utilities (although amateur radio is not defined as a network utility). Therefore the Operative District Plan is not well aligned with the functions of the Council under s31(1)(a).
Gives effect to higher level documents	Neutral – there is no requirement to manage amateur radio in higher level documents.	Neutral – there is no requirement to manage amateur radio in higher level documents.
Usefulness:		
Guides decision-making	Yes – The objectives provide clarity of what is to be achieved in relation to managing Infrastructure when considering resource consent applications under s104.	There is no objective to guide decision making.
Meets best practice for objectives	Yes – The objective clearly articulates an outcome and is drafted in plain English and active language.	
Reasonableness:		
Will not impose unjustifiably high costs on the community/parts of the community	Yes – The objectives do not create unjustifiably high costs on the community. Overall, the proposed objectives will provide certainty to the community in terms of effects management, as well as a pathway for amateur radio users.	Not providing an objective could result in unnecessary costs on the community through undesirable effects from amateur radio infrastructure.

Acceptable level of uncertainty and risk	Yes – The managing the effects of amateur radio infrastructure provides a degree of certainty.	Not having an objective results in uncertainty and risk
Achievability:		
Consistent with identified tangata whenua and community outcomes	Yes - The proposed objective is consistent with the strategic directions	No objective, is therefore inconsistent with the strategic directions
Realistically able to be achieved within the Council's powers, skills and resources	Yes – The approach is well understood and within Council's statutory powers. The objectives are realistically able to be achieved based on the Council's responsibilities under the RMA. The greater certainty of provisions assists with matching skills and resources.	Yes – The status quo is currently being implemented within Council's powers, skills, and resources.
Summary		
The above analysis indicates that the preferred objective achieves the purpose of the RMA in more overt fashion than the status quo.		

9.0 Evaluation of Reasonably Practicable Options and Associated Provisions

9.1 Introduction

Under s32(1)(b) of the RMA, reasonably practicable options to achieve the objective/s associated with this proposal need to be identified and examined. This section of the report evaluates the proposed policies and rules, as they relate to the associated objective(s).

Along with the proposed provisions, the Council has also identified through the research, consultation, information gathering, and analysis undertaken in relation to this topic a reasonably practicable alternative option to achieve the objectives.

The technical and consultation input used to inform this process is outlined in section 5 of this report.

9.2 Evaluation method

For each potential approach an evaluation has been undertaken relating to the costs, benefits and the certainty and sufficiency of information (as informed by section 5 of this report) in order to determine the effectiveness and efficiency of the approach, and whether it is the most appropriate way to achieve the relevant objective(s).

This evaluation is contained in the following sections.

9.3 Provisions to achieve Objective INF-O1, INF-O2 and INF-O4

For the purpose of this evaluation, the Council has considered the following potential options:

1. The proposed provisions
2. The status quo

Objectives INF-O1, INF-O2 and INF-O4			
<i>[Recognise the benefits and availability of infrastructure, as well as the adverse effects of infrastructure]</i>			
Option 1: Proposed approach (recommended)	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p>Policies:</p> <p>INF-P1, INF-P2, INF-P3, INF-P4, INF-P5, INF-P6, INF-P12 and INF-P13</p> <p>Rules:</p> <p>INF-R1, INF-R2, INF-R3, INF-R4, INF-R5, INF-R6, INF-R7, INF-R8, INF-R9, INF-R10, INF-R11, INF-R12, INF-R13, INF-R14, INF-R15, INF-R16, INF-R17, INF-R18, INF-R19 and INF-R20</p> <p>Other Methods:</p> <p>INF-S1, INF-S3, INF-S3, INF-S4, INF-S5, INF-S6, INF-S7, INF-S8, INF-S9, INF-S10 and INF-S18</p>	<p>Environmental</p> <ul style="list-style-type: none"> There are not considered to be any direct or indirect environmental costs to recognising the benefits and availability of infrastructure, as well as the adverse effects of infrastructure. It is noted however that some infrastructure may be perceived as impacting adjoining properties. <p>Economic</p> <ul style="list-style-type: none"> There will be process costs to infrastructure providers where resource consents are required. <p>Social</p> <ul style="list-style-type: none"> There are no direct or indirect social costs to recognising the benefits and availability of infrastructure, as well as the adverse effects of infrastructure. <p>Cultural</p> <ul style="list-style-type: none"> There are no direct or indirect cultural costs to recognising the benefits and availability of infrastructure, as well as the adverse effects of infrastructure. 	<p>Environmental</p> <ul style="list-style-type: none"> The provisions provide appropriate limits through standards and resource consent considerations that provide benefit to the environment. <p>Economic</p> <ul style="list-style-type: none"> The provisions provide certainty to infrastructure providers. Infrastructure provision can directly and indirectly provide for economic growth and employment related benefits. <p>Social</p> <ul style="list-style-type: none"> Infrastructure supports people, communities, and businesses in their everyday activities. <p>Cultural</p> <ul style="list-style-type: none"> Infrastructure supports people, communities, and businesses in their everyday activities. 	<p>There is certain and sufficient information on which to base the proposed policies and methods as:</p> <ul style="list-style-type: none"> They directly respond to objectives and policies contained in the RPS; They do not depart significantly from the current operative district plan provisions; and They have been subject to a submissions process on the Draft District Plan provisions, which has resulted in some changes to reflect community and infrastructure providers' views.
Effectiveness and efficiency	<p>Effectiveness</p> <p>The proposed provisions are considered to be a highly effective means of meeting the objectives as they will provide increased social, economic and cultural benefits as outlined above.</p> <p>Including clear policy guidance for the provision for and recognition of infrastructure gives effect to requirements in the RPS and is therefore highly effective. They will provide effective guidance to decision makers when considering resource consent applications for infrastructure.</p>		<p>Efficiency</p> <p>The proposed provisions are considered to be an efficient means for achieving the objectives given the above assessment of costs and benefits.</p>
Overall evaluation	<p>This option is the most appropriate way to achieve the preferred objectives as it achieves the best balance between costs and benefits taking environmental, social, economic, and cultural factors into consideration, and will be effective and efficient methods for sustainably managing natural and physical resources.</p>		

Option 2: Status Quo	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p><u>Policies:</u> 22.2.1.1, 22.2.1.1A, 22.2.1.1B, 22.2.1.2, 22.2.1.3, 22.2.1.4,</p> <p><u>Rules:</u> 23.1.1, 23.1.2, 23.1.3, 23.1.6, 23.1.7, 23.1.8, 23.1.8A, 23.1.9, 23.1.11, 23.1.12, 23.1.13, 23.1.14, 23.1.15, 23.1.16, 23.1.17, 23.2, 23.3, 23.4</p>	<p><i>Environmental</i></p> <ul style="list-style-type: none"> There are not considered to be any direct or indirect environmental costs to allowing infrastructure provided effects are managed. It is noted however that some infrastructure may be perceived as impacting adjoining properties. <p><i>Economic</i></p> <ul style="list-style-type: none"> There are process costs to infrastructure providers where resource consents are required. <p><i>Social</i></p> <ul style="list-style-type: none"> There are not considered to be any direct or indirect social costs to allowing infrastructure provided effects are managed. <p><i>Cultural</i></p> <ul style="list-style-type: none"> There are not considered to be any direct or indirect cultural costs to allowing infrastructure provided effects are managed. 	<p><i>Environmental</i></p> <ul style="list-style-type: none"> The provisions provide appropriate limits through rule provisions and resource consent considerations that provide benefit to the environment. <p><i>Economic</i></p> <ul style="list-style-type: none"> The provisions provide certainty to infrastructure providers. Infrastructure provision can directly and indirectly provide for economic growth and employment related benefits. <p><i>Social</i></p> <ul style="list-style-type: none"> Infrastructure supports people, communities, and businesses in their everyday activities. <p><i>Cultural</i></p> <ul style="list-style-type: none"> Infrastructure supports people, communities, and businesses in their everyday activities. 	<p>There is reasonably certain and sufficient information on which to base the proposed policies and methods as they indirectly respond to objectives and policies contained in the RPS. However, they are focussed more on the management of adverse effects as opposed to recognising the benefits of infrastructure, and as such do not provide an overall direction for decision makers to consider.</p>
<p><u>Effectiveness and efficiency</u></p>	<p><i>Effectiveness</i></p> <p>The proposed provisions are considered to be a reasonably effective means of meeting the objectives as they will provide increased social, economic and cultural benefits as outlined above.</p>		<p><i>Efficiency</i></p> <p>The proposed provisions are considered to be a relatively efficient means for achieving the objectives given the above assessment of costs and benefits.</p>
<p><u>Overall evaluation</u></p>	<p>This option is a partially appropriate way to achieve the preferred objectives as it achieves a balance between costs and benefits taking environmental, social, economic, and cultural factors into consideration, and will be effective and efficient methods for sustainably managing natural and physical resources. However, some benefits of infrastructure are not able to be comprehensively considered.</p>		

9.4 Policies and Rules to achieve Objective INF-O3

For the purpose of this evaluation, the Council has considered the following potential options:

1. The proposed provisions
2. The status quo

Objectives INF-O3			
<i>Adverse effects on infrastructure</i>			
Option 1: Proposed approach (recommended)	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p>Policies:</p> <p>INF-P7</p> <p>Rules:</p> <p>INF-R22 and INF-R23</p> <p>Other Methods:</p> <p>INF-S12, INF-S14, Standards in zone and district wide chapters.</p>	<p>Environmental</p> <ul style="list-style-type: none"> There are not considered to be any direct or indirect environmental costs to recognising adverse effects on infrastructure. <p>Economic</p> <ul style="list-style-type: none"> There may be costs, including opportunity costs, to applicants who are impacted by reverse sensitivity provisions. <p>Social</p> <ul style="list-style-type: none"> There are not considered to be any direct or indirect social costs to recognising adverse effects on infrastructure. <p>Cultural</p> <ul style="list-style-type: none"> There are not considered to be any direct or indirect cultural costs recognising adverse effects on infrastructure. 	<p>Environmental</p> <ul style="list-style-type: none"> There are not considered to be any direct or indirect environmental benefits to recognising adverse effects on infrastructure. <p>Economic</p> <ul style="list-style-type: none"> The provisions provide certainty to infrastructure providers. Infrastructure provision can directly and indirectly provide for economic growth and employment related benefits. <p>Social</p> <ul style="list-style-type: none"> There are not considered to be any direct or indirect social benefits to recognising adverse effects on infrastructure. <p>Cultural</p> <ul style="list-style-type: none"> There are not considered to be any direct or indirect cultural benefits to recognising adverse effects on infrastructure. 	<p>It is considered that there is certain and sufficient information on which to base the proposed policies and methods as:</p> <ul style="list-style-type: none"> They directly respond to objectives and policies contained in the RPS; and They have been subject to a submissions process on the Draft Plan provisions, which resulting in changes to reflect community and infrastructure providers' views.
Effectiveness and efficiency	Effectiveness		Efficiency
	Including clear policy guidance for the recognition and consideration of adverse effects on infrastructure gives effect to requirements in the RPS and is therefore highly effective.		The proposed provisions are considered to be highly efficient means for achieving the objectives given the above assessment of costs and benefits.
Overall evaluation	This option is the most appropriate way to achieve the preferred objectives as it achieves the direction established in the RPS.		
Option 2: Status Quo	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p>Policies:</p> <p>[no policy]</p> <p>Rules:</p> <p>[no rules]</p>	<p>Environmental</p> <ul style="list-style-type: none"> There are no direct or indirect environmental costs to recognising adverse effects on infrastructure. <p>Economic</p> <ul style="list-style-type: none"> There may be costs to infrastructure providers who have to move assets or alter operations as a result of 	<p>Environmental</p> <ul style="list-style-type: none"> There are no direct or indirect environmental benefits to recognising adverse effects on infrastructure. <p>Economic</p> <ul style="list-style-type: none"> There are no direct or indirect economic costs to recognising adverse effects on infrastructure. 	<p>The existing plan does not give effect to the reverse sensitivity direction provided in the RPS, and therefore is considered to be uncertain in instances where this issue could arise.</p>

	<p>incompatible development affecting existing infrastructure.</p> <p>Social</p> <ul style="list-style-type: none"> There are no direct or indirect social costs to recognising adverse effects on infrastructure. <p>Cultural</p> <ul style="list-style-type: none"> There are no direct or indirect cultural costs recognising adverse effects on infrastructure. 	<p>Social</p> <ul style="list-style-type: none"> There are no direct or indirect social costs to recognising adverse effects on infrastructure. <p>Cultural</p> <ul style="list-style-type: none"> There are no direct or indirect cultural costs to recognising adverse effects on infrastructure. 	
<p><u>Effectiveness and efficiency</u></p>	<p>Effectiveness</p> <p>The provisions are considered to be an ineffective means of meeting the objectives as they do not consider the RPS direction.</p>	<p>Efficiency</p> <p>The proposed provisions are considered to be an inefficient means for achieving the objectives given the above assessment of costs and benefits.</p>	
<p><u>Overall evaluation</u></p>	<p>This option is an inappropriate way to achieve the preferred objectives as it does not provide for the direction established in the RPS.</p>		

9.5 Policies and Rules to achieve Objective INF-O5

For the purpose of this evaluation, the Council has considered the following potential options:

1. The proposed provisions
2. The status quo

Objectives INF-O5			
<i>Transport network</i>			
Option 1: Proposed approach (recommended)	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p><u>Policies:</u> INF-P9, INF-P10 and INF-P11</p> <p><u>Rules:</u> INF-R24 and INF-R25</p> <p><u>Other Methods:</u> INF-S13, INF-S15, INF-S16, INF-S17 and INF-S18</p>	<p><i>Environmental</i></p> <ul style="list-style-type: none"> There may be some direct or indirect environmental costs to providing for transport network infrastructure, which will be managed through the resource consent process. <p><i>Economic</i></p> <ul style="list-style-type: none"> There may be costs for applicants who are seeking resource consent for new transport infrastructure <p><i>Social</i></p> <ul style="list-style-type: none"> There are social costs resulting from transport infrastructure. <p><i>Cultural</i></p> <ul style="list-style-type: none"> There are not considered to be any direct cultural costs from transport infrastructure. Indirect cultural costs from transport infrastructure are managed through the overlay process. 	<p><i>Environmental</i></p> <ul style="list-style-type: none"> Transport infrastructure, particularly when multi-modal, can result in environmental benefits. <p><i>Economic</i></p> <ul style="list-style-type: none"> Transport infrastructure can directly and indirectly provide for economic growth and employment related benefits. <p><i>Social</i></p> <ul style="list-style-type: none"> Transport infrastructure can directly and indirectly provide for social benefits. <p><i>Cultural</i></p> <ul style="list-style-type: none"> There are not considered to be any direct or indirect cultural benefits to recognising adverse effects on infrastructure. 	<p>It is considered that there is certain and sufficient information on which to base the proposed policies and methods as:</p> <ul style="list-style-type: none"> They directly respond to objectives and policies contained in the RPS; and They have been subject to a submissions process on the Draft Plan provisions, which resulting in changes to reflect community and infrastructure providers' views.
<u>Effectiveness and efficiency</u>	<i>Effectiveness</i> Including clear policy guidance for development and management of transport infrastructure gives effect to requirements in the RPS and is therefore highly effective.		<i>Efficiency</i> The proposed provisions are considered to be highly efficient means for achieving the objectives given the above assessment of costs and benefits.
<u>Overall evaluation</u>	This option is the most appropriate way to achieve the preferred objectives as it achieves the direction established in the RPS.		
Option 2: Status Quo	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p><u>Policies:</u> [no policies]</p> <p><u>Rules:</u> [no rules]</p>	<p><i>Environmental</i></p> <ul style="list-style-type: none"> There may be some direct or indirect environmental costs to providing for transport network infrastructure, which will be managed through the resource consent process. <p><i>Economic</i></p> <ul style="list-style-type: none"> There may be costs for applicants who are seeking resource consent for new transport infrastructure, 	<p><i>Environmental</i></p> <ul style="list-style-type: none"> There are unlikely to be direct or indirect environmental benefits from not regulating transport infrastructure in the District Plan. <p><i>Economic</i></p> <ul style="list-style-type: none"> There may be economic benefits to transport developers from not regulating transport infrastructure in the District Plan. 	<p>The existing plan does not give effect to the direction provided in the RPS, and therefore is considered to be uncertain in instances where this issue could arise.</p>

	<p>including costs related to a lack of direction and certainty in the Operative District Plan.</p> <p>Social</p> <ul style="list-style-type: none"> • There are social costs resulting from transport infrastructure. <p>Cultural</p> <ul style="list-style-type: none"> • There are not considered to be any direct cultural costs from transport infrastructure. Indirect cultural costs from transport infrastructure are managed through the other district plan processes. 	<p>Social</p> <ul style="list-style-type: none"> • There are not potential social costs from not regulating transport infrastructure in the District Plan in the form of potential adverse safety effects. <p>Cultural</p> <ul style="list-style-type: none"> • There are not considered to be any direct or indirect cultural costs from not regulating transport infrastructure in the District Plan. 	
<u>Effectiveness and efficiency</u>	<p>Effectiveness</p> <p>The provisions are considered to be an ineffective means of meeting the objectives as they do not consider the RPS direction.</p>	<p>Efficiency</p> <p>The proposed provisions are considered to be an inefficient means for achieving the objectives given the above assessment of costs and benefits.</p>	
<u>Overall evaluation</u>	<p>This option is an inappropriate way to achieve the preferred objectives as it does not provide for the direction established in the RPS.</p>		

9.6 Policies and Rules to achieve Objective INF-O6

For the purpose of this evaluation, the Council has considered the following potential options:

1. The proposed provisions
2. The status quo

Objectives INF-O5			
<i>Amateur Radio</i>			
Option 1: Proposed approach (recommended)	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p><u>Policies:</u></p> <p>INF-P8</p> <p><u>Rules:</u></p> <p>INF-R21</p> <p><u>Other Methods:</u></p> <p>INF-S11</p>	<p><i>Environmental</i></p> <ul style="list-style-type: none"> There may be some direct or indirect environmental costs to providing for amateur radio in the District Plan. <p><i>Economic</i></p> <ul style="list-style-type: none"> There may be costs for applicants who are seeking resource consent for new amateur radio infrastructure. <p><i>Social</i></p> <ul style="list-style-type: none"> There are potential visual effects on adjoining sites amateur radio infrastructure, which could be considered a social cost. <p><i>Cultural</i></p> <ul style="list-style-type: none"> There are not considered to be any direct or indirect cultural costs from amateur radio infrastructure. 	<p><i>Environmental</i></p> <ul style="list-style-type: none"> There are unlikely to be direct or indirect environmental benefits of providing for amateur radio in the District Plan. <p><i>Economic</i></p> <ul style="list-style-type: none"> There are unlikely to be direct or indirect economic benefits of providing for amateur radio in the District Plan. <p><i>Social</i></p> <ul style="list-style-type: none"> Amateur radio infrastructure can directly and indirectly provide for social benefits, particularly in the aftermath of a disaster. <p><i>Cultural</i></p> <ul style="list-style-type: none"> There are not considered to be any direct or indirect cultural benefits to recognising adverse effects on infrastructure. 	<p>It is considered that there is certain and sufficient information on which to base the proposed policies and methods as they have been subject to a submissions process on the Draft District Plan provisions, which resulted in changes to reflect community and infrastructure providers' views.</p>
<u>Effectiveness and efficiency</u>	<p><i>Effectiveness</i></p> <p>Including clear policy guidance for development and management of amateur radio infrastructure is effective as it provides clarity for users and the wider community.</p>		<p><i>Efficiency</i></p> <p>The proposed provisions are an efficient means for achieving the objectives given the above assessment of costs and benefits.</p>
<u>Overall evaluation</u>	<p>This option is the most appropriate way to achieve the preferred objectives as it provides certainty.</p>		
Option 2: Status Quo	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p><u>Policies:</u></p> <p>[none]</p> <p><u>Rules:</u></p> <p>23.1.18, 23.3.1</p>	<p><i>Environmental</i></p> <ul style="list-style-type: none"> There may be some direct or indirect environmental costs to providing for amateur radio in the District Plan. <p><i>Economic</i></p> <ul style="list-style-type: none"> There may be costs for applicants who are seeking resource consent for new amateur radio infrastructure, and do not have policy guidance in terms of how to assess effects. 	<p><i>Environmental</i></p> <ul style="list-style-type: none"> There are unlikely to be direct or indirect environmental benefits of providing for amateur radio in the District Plan. <p><i>Economic</i></p> <ul style="list-style-type: none"> There are unlikely to be direct or indirect economic benefits of providing for amateur radio in the District Plan. <p><i>Social</i></p>	<p>There is certain and sufficient information for assessing when a resource consent is required for amateur radio infrastructure, however no direct objective or policy guidance when resource consents are required.</p>

	<p>Social</p> <ul style="list-style-type: none"> • There are not considered to be any direct or indirect social costs from amateur radio infrastructure. <p>Cultural</p> <ul style="list-style-type: none"> • There are not considered to be any direct or indirect cultural costs from amateur radio infrastructure. 	<ul style="list-style-type: none"> • Amateur radio infrastructure can directly and indirectly provide for social benefits, particularly in the aftermath of a disaster. <p>Cultural</p> <ul style="list-style-type: none"> • There are not considered to be any direct or indirect cultural benefits to recognising adverse effects on infrastructure. 	
<u>Effectiveness and efficiency</u>	<p>Effectiveness</p> <p>The provisions are considered to be a relatively effective means of meeting the objectives.</p>		<p>Efficiency</p> <p>The proposed provisions are considered to be a relatively efficient means for achieving the objectives given the above assessment of costs and benefits.</p>
<u>Overall evaluation</u>	<p>This option is a partially appropriate way to achieve the preferred objectives, however it is not explicit.</p>		

10.0 Conclusion

This evaluation has been undertaken in accordance with section 32 of the RMA in order to identify the need, benefits and costs and the appropriateness of the proposal having regard to its effectiveness and efficiency relative to other means in achieving the purpose of the RMA.

The evaluation demonstrates that this proposal is the most appropriate option as it:

- Gives direction to higher order statutory planning documents;
- Provides for infrastructure, while managing adverse effects;
- Applies clear, certain standards with a pathway for when standards are not met; and
- Provides direction for the consideration of the effects of infrastructure activities that are more likely to generate significant adverse effects and therefore require case by case assessment.

Appendix 2: Feedback on Draft District Plan 2021

Who	Feedback Received	Response
Powerco	Seeks that infrastructure sub-chapters should all be contained within the Infrastructure Chapter itself.	Changes made for the following reasons: Clarity to plan users as to hierarchy.
	Definition of additional Infrastructure – intent is unclear	No changes made for the following reasons: Definition is from NPS-UD.
	Seeks that cabinet definition is expanded to include gas distribution enclosures	Changes made for the following reasons: Effect of gas distribution structures the same as other cabinets included in definition
	Seeks new definition – customer connection	Changes made for the following reasons: Include as Customer Connections are a necessity
	Network Utility Operator – not accurate	Changes made for the following reasons: Updating definition provides accuracy with RMA definition
	Definition of RSI and upgrading – not accurate	Changes made in part for the following reasons: Updating RSI definition provides accuracy with RPS definition. The upgrading definition applies to existing infrastructure – at the time upgrading works are undertaken. I.e. if new infrastructure is built it then becomes existing and therefore upgrading applies to it.
	Revision of introduction to remove word communication to ensure it applies to all NU infrastructure. Replace words 'ongoing use' in introduction to 'operation'. Recognise reverse sensitivity effects in introduction.	Changes made in part for the following reasons: Provides clarity, aligns introduction language with the rest of the chapter in terms of "operation".
	INF-O7 – should be about enabling infrastructure	Changes made in part for the following reasons:

	Replace words as per submission point. Provides distinction form INF-O2
INF-P1 – remove reference to appropriate locations	Changes made in part for the following reasons: Reference is needed as there are inappropriate locations for infrastructure to be located
INF-P4 – remove qualifiers	Changes made in part for the following reasons: Amend policy to only refer to technical feasibility. By retaining the words 'technically feasible; it recognises instances where some inf cannot be located underground.
INF-P5 – problematic to combine upgrades and the development of new infrastructure as upgrades have less effects. Amenity shouldn't be considered	Changes made for the following reasons: Infrastructure can have amenity effects, which require consideration under Part 2 RMA, remains appropriate to combine upgrade and new infrastructure as same matters are considered when making decisions as to applicability
INF-P7 - The provision protecting infrastructure from reverse sensitivity effects of land disturbance and sensitive activities locating in close proximity to network utilities is unclear.	Changes made for the following reasons: The clarity sought is in the policy – land disturbance is an activity, and sensitivity is dealt with in reverse sensitivity definition
INF-R1 – Removal of redundant infrastructure, particularly underground infrastructure is inefficient.	Changes made for the following reasons: Ensure rule does not apply to underground infrastructure. Removing underground infrastructure can have a greater environmental effect than leaving it in situ
INF-R7 – remove ancillary from gas transmission	Changes made for the following reasons: Replace words as per submission point. Ancillary term unnecessary – it is size that matters not type

INF-R16 – change activity status from DIS to RDIS	<p>Changes made for the following reasons:</p> <p>Unclear what Matters of Discretion would apply</p>
INF-R28 – delete in entirety – infrastructure already has to comply with standards, why restrict access to roads by providing a catch all	<p>Changes made for the following reasons:</p> <p>Need to work through – intent of INF-R28 is to be enabling not disabling</p>
INF-S2 – delete clause 3 in its entirety.	<p>Changes made for the following reasons:</p> <p>delete clause 3 in its entirety. Matter dealt with under a separate process to RMA. Not addressing effects.</p>
INF-S5 – augment to include pipes.	<p>Changes made for the following reasons:</p> <p>Replace words as per submission point. Ensures all customer connection types are provided for. No difference in effect</p>
INF-S6 – technical wording changes, and seek height to be related to zones.	<p>Changes made for the following reasons:</p> <p>Make general to all structures so gas and structures and all other inf structures are subject to same standards, as have same/similar effects. Technical accuracy necessary. Height changes not appropriate as higher buildings can have greater adverse effects – no setbacks required and potential for structures to be in road. Open to height limit of 2.5m increasing.</p>
INF-S7 – should not be applied to infrastructure located in roads	<p>Changes made for the following reasons:</p> <p>Replace words as per submission point (or variation of to ensure alignment with definition eg formed legal road). If road is already located in riparian margin then no additional effect, and want infrastructure located in roads</p>
INF-NFL-R50 – should apply to existing structures	<p>Changes made for the following reasons:</p>

		Replace words as per submission point (or variation of e.g. structure not enclosure). Existing structures in SAL or R&H effects are known and should be recognised in the rule.
	NF-NFL-R53 – recognise new infrastructure in existing structures	Changes made for the following reasons: Replace words as per submission point (or variation of e.g. structure not enclosure). Existing structures in SAL or R&H effects are known and should be recognised in the rule.
	INF-OL-R66 – permit new customer connections to heritage buildings	Changes made for the following reasons: Heritage buildings require particular protection. CON activity status recognises need for new Customer Connections, and controls potential adverse effects on such buildings. Aligns with Part 2 RMA
	NF-OL-R68 - permit upgrades of customer connections to heritage buildings	Changes made for the following reasons: Heritage buildings require particular protection. CON activity status recognises need for new Customer Connections, and controls potential adverse effects on such buildings. Aligns with Part 2 RMA
	What is usefulness of INF-NATC-R59 – simply repeats the Inf parent chapter	Changes made for the following reasons: Provides clarity that the matter has been considered for the NAT C overlay and that parent chapter rules are sufficient
Greater Wellington Regional Council	INF-P9 – want consideration about priority for walking, cycling, PT over parking/loading/vehicle in accordance with WCC sustainable transport hierarchy and RLTP 2021 strategic direction	Changes made in part for the following reasons: To give effect to WCC sustainable transport hierarchy and RLTP 2021. The Policy already signals need to consider walking, cycling PT, as well as parking/loading and vehicles.
Chorus, Spark and Vodafone	Ancillary Transport Network Infrastructure – telecommunication kiosks to be removed	Changes made for the following reasons:

	Telecommunication kiosks are not transport network infrastructure, and are provided for under other rules.
Add a definition of radiocommunication as it is included as RFI	Changes made for the following reasons: Provides consistency.
INF-O1, 2, 3, 4 and 7 are supported. INF-P1-5 supported. INF-P6 needs preamble reframed as an effect can be managed without avoiding all adverse effects.	Changes made for the following reasons: Gives effect to RMA - recognise not all adverse effects need to be avoided.
INF-R1-4, 7, 11-13 supported. INF-R5 has a cross reference error – should be to INF-S5 not INF-S6. INF-R6 needs to recognise temporary telecommunications coverage and amend a cross reference error. INF-R8 should be split as it does not require links to standards other than INF-R1. INF-R10 – provide 15m permitted height in Res zones as telcos supports WFUE, and amenity provided HIRTB met. INF-R28 – clarity needed as to how this rule is applied.	Changes made for the following reasons: Provides greater clarity, amends cross reference errors.
INF-S2 seek permission to drill under a natural waterbody	No changes made for the following reasons: Further consultation necessary.
INF-S3 – Earthworks depth regarding national grid yard	Changes made for the following reasons: Provides clarity.
INF-S4 – cross referencing error	Changes made for the following reasons: Remedies cross reference error.
INF-S8 – permit 15m in residential zone	Changes made for the following reasons: Amenity controlled with HIRTB.
INF-S12 – needs to exclude NU	Changes made for the following reasons: Provides clarity.
INF-S14 – need to include a process for confirming location and not clashing with street trees. Consider using AUP	No changes made for the following reasons: Further consultation necessary.

INF-CE-P15, 17, 19, 22, 23 amended to ensure infrastructure that needs to be in CE does not need to avoid all adverse effects to meet the NZCPS test of restoring natural character	Changes made for the following reasons: Provides consistency with higher order planning documents
New rule – provide for customer connections	Changes made for the following reasons: Customer connections are a necessary part of a network
Need INF-ECO-S21 to provide for 50m ³ for all activities not just Nat Grid	Changes made for the following reasons: NESET provides a baseline, adopted wider for all activities.
INF-NFL-P40, 42, 44 and 46 need to be amended to ensure infrastructure within ONL, ONF, SAL and R+H outside of CE do not need to avoid all adverse effects	Changes made for the following reasons: Provides consistency with higher order planning documents
INF-NFL-S22 to provide for 50m ³ for all activities not just Nat Grid	Changes made for the following reasons: NESET provides a baseline, adopted wider for all activities.
INF-NH-R60 to be amended to permit underground telecommunication networks in all NH overlays	Changes made for the following reasons: There are areas where there is existing development in NH areas. Provides alignment with NESTF
INF-NH-R61 amended to exempt telecommunications in Overland Flow Path Area where located in a road	Changes made for the following reasons: Provides alignment with NESTF
INF-NH-R62 amended to exempt telecommunications and also temporary infrastructure	Changes made for the following reasons: There are areas where there is existing development in NH areas. Provides alignment with NESTF
INF-NH-R63 amended to exempt telecommunications and also temporary infrastructure	Changes made for the following reasons: There are areas where there is existing development in NH areas. Provides alignment with NESTF
INF-OL-R64 – include an exemption to undertake earthworks in formed	Changes made for the following reasons:

	road reserve and low impact work around notable trees	Provides for earthworks in areas where earthworks have already been undertaken.
	INF-OL-R65 – allow new underground infrastructure in heritage areas (outside of archaeological sites)	Changes made for the following reasons: Underground works will not adversely affect heritage area values. Arch sites are protected.
	INF-OL-R66 – should not apply to above ground customer connection	Changes made for the following reasons: No effect on notable trees from above ground customer connections (except minor trimming which is provided for anyway).
	INF-OL-R68 – allow some upgrading	Changes made for the following reasons: If telco infrastructure already affixed to a heritage building, what is the effect of allowing slightly larger upgraded infrastructure.
Wellington Electricity Lines	Support definitions of cabinet, infrastructure, and network utility operator. Definition of building should explicitly exclude power poles, support structures etc in line with Building Act. Changes sought as follows: <ul style="list-style-type: none"> - Maintenance and Repair – include replacement - RSI – update to use appropriate terminology - Temporary Activities – include provision for infrastructure 	Some changes made for the following reasons: <i>Building</i> is a defined National Planning Standards term. Allow end of life infrastructure to be replaced by infrastructure of same size as no change in effect on the built environment. RSI definition provides for greater specificity in terms of terminology. Temporary infrastructure activities permitted under INF-R6.
	INF-P4 include practicable measure in policy	Changes made for the following reasons: Practicability is a necessary consideration.
	INF-P7 include sub-transmission lines to protect from reverse sensitivity	No changes made for the following reasons: Sub-transmission lines already protected via INF-P7.4

	INF-S3 – want specific recognition of progressive stabilisation	No changes made for the following reasons: Standard already provides what the submission point covers
	INF-S4 – need a particular width for pi poles	Changes made for the following reasons: Provides for a technical requirement
	INF-S4 clarification between (1) and (7) needed	Changes made for the following reasons: (1) applies for replacement poles, (7) applies for new poles
	INF-S7 – want linear infrastructure not subject to 10m riparian setback, but ok for support structures	Changes made for the following reasons: Riparian setback needed for EW measures etc.
	INF-S8 – need more than 8m of height	Changes made for the following reasons: Appropriate to link to the zone height – noting in residential zones this height varies between 8m and 21m
	Table 2 – INF Street Trees – need setback and root guards for street trees	Changes made for the following reasons: Provides for both underground infrastructure and street tree.
Waka Kotahi	Request for the definition of “Additional Infrastructure” to include ‘transport network and include, but is not limited to’ Request for “Network Utility Operator” to have specific reference to state highways Supports “RI” Supports “Reverse Sensitivity”	Changes made for the following reasons: Definition of ‘Additional Infrastructure’ is from NPS-UD Definition of ‘Network Utility Operator’ is from RMA and provides for all roads
	INF-O2 amend to include specific reference to state highway	Changes made for the following reasons: Rejected as All roads for part of the Infrastructure definition
	INF-O1, 3, 4, 5, 6, 7 Supported INF-O7 – Name is the same as INF-O2 and INF-P5	Changes made for the following reasons: INF-O7 is renamed which resolves confusion with INF-O5

	INF-P4 – Network infrastructure not defined	Changes made for the following reasons: Refers to infrastructure not network infrastructure to avoid confusion
	INF-P7 – request to specifically reference health effects	Changes made for the following reasons: Updates clause 4 to discuss protection of sensitive activities from effects of infrastructure to align with definition
	INF-P6 – request to recognise construction effects	Changes made for the following reasons: Changes made as per the submission point to cover a gap in policy
	INF-P10 and INF-P11 supported	No changes necessary
	INF-S14 – Road speed should be a function of design INF-Table 5 – seek longer sight difference	Changes made for the following reasons: Talks with the road team are needed before changes can be made
	INF-ECO-P33 – reference health and safety risks such as vegetation control for sight lines Supports other inf policies	Changes made for the following reasons: Changes made as per submission point to cover gap in policy
Kainga Ora	INF-O1 – include mitigate and manage for adverse effects INF-O3 – want the term protect replaced with managed, and deletion of specific reference to reverse sensitivity effects INF- O4 and INF-O5 supported INF-O7 repeats INF-O2 so INF-O7 should be merged with INF-O2 or deleted	Changes made for the following reasons: INF-O1 changes not made as the objective refers to manage – which encompasses avoidance, remediation or mitigation of adverse effects, so the point is already covered in the objective INF-O3 changes wording from protect to manage as the term manage is more appropriate. Retains the specific mention of reverse sensitivity so it aligns with RPS definition of reverse sensitivity and Part 2 RMA INF-O2 and INF-O7 are merged to provide clarity for plan users
	INF-P1, 2, 3, 6, 9 are supported	Changes made for the following reasons:

	<p>INF-P5 to include mitigate and manage adverse effects</p> <p>INF-P6 – changes sought to align with INF-O2</p> <p>INF-P10 – seeks deletion</p>	<p>INF-P5 – no changes made as the policy refers to manage – which encompasses avoidance, remediation or mitigation of adverse effects, so the point is already covered in the objective</p> <p>INF-P6 – the term manage is more appropriate than protect so it aligns policy with INF-O2</p> <p>INF-P10 – no reason given in submission to why deletion is sought</p>
	<p>All rules – seek inclusion of a non-notification for RDIS activities</p>	<p>Changes made for the following reasons:</p> <p>Notification decisions are to be made on a case by case basis on the merit of application</p>
	<p>INF-R21 – seek removal of specific reference to reverse sensitivity effect</p> <p>INF-R22, 23, and 24, INF-S12 – consider Nat grid provisions are overly restrictive and do not efficiently manage sensitive activities within close proximity to and under the Nat grid</p>	<p>Changes made for the following reasons:</p> <p>Reverse sensitivity is a matter which needs to be considered as per RPS direction</p>
	<p>INF- Design of Roads – delete in entirety</p>	<p>Changes made for the following reasons:</p> <p>No reason given in submission as to why deletion sought</p>
Transpower	<p>Include definitions for National Grid, National Grid Yard and National Grid Subdivision Corridor. And map accurately</p>	<p>Changes made for the following reasons:</p> <p>Changes made as per submission point to provide clarity for plan users</p>
	<p>Query number of Inf sub-chapters, no Nat Grid policies in other subchapters, want policies that specifically recognise benefits of National Grid and effects of other activities on National Grid</p>	<p>Changes made for the following reasons:</p> <p>Need clarity in explanation as to how sub-chapters work.</p> <p>INF-P1 recognises benefits of infrastructure – a National Grid specific would essentially provide a double up. Likewise INF-P7 recognises reverse sensitivity</p>
	<p>Seeks standalone provisions</p>	<p>Changes made for the following reasons:</p> <p>Will result in additional policies which do not offer anything</p>

	additional to existing policies. NPSET does not require separate policies to other infrastructure providers
Retain definitions of Functional Need, Infrastructure, Maintenance and repair, Operational Need, RSI, and Upgrading	No changes needed
New definitions needed for National Grid, National Grid subdivision corridor, National Grid Yard	Changes made for the following reasons: Changes made as per submission to provide clarity
Amend definition of Nation Grid Substation Yard	Changes made for the following reasons: Changes made as per submission to provide clarity
Wants an approach where NPSET is specifically considered	No changes made for the following reasons: No changes made at this stage
Introduction – reference to NPSET be more explicit	Changes made for the following reasons: NPSET already recognised in the introduction
Retain INF-O1 and INF-O2	No changes needed
Amend INF-O3 to be more specific about adverse effects	Changes made for the following reasons: Changes made as per submission to provide clarity
INF-P1 shouldn't refer to appropriate locations as policy is about benefit recognition	Changes made for the following reasons: As per submission to provide clarity to benefits, no clarity as to what is appropriate location in policy, and other policies deal with appropriate locations
Retain INF-P3, P5, P6	No changes needed
Amend INF-P4 to refer to operational practicability	Changes made for the following reasons: Changes made as per submission to provide clarity
Amend INF-P7 to use specific defined terms in the DDP, not 'electricity lines'	Changes made for the following reasons:

	Changes made as per submission to provide clarity
Amend INF-R1 to specify relationship to existing underground infrastructure	Changes made for the following reasons: Changes made as per submission to provide clarity
Retain INF-R3, R4, R6, R7, R8, R14, R15	No changes needed
INF-R21 – advice to come	Changes made for the following reasons: Move the rule to subdivision chapter Provides clarity – rule is not about Infrastructure, but subdivision for other activities
INF-R22 – amend to provide specific requirements	Changes made for the following reasons: As per submission. Also note move to subdivision chapter for reasons given above for INF-R21. Provides clarity
INF-R23 – provide greater nuance to EW rules	Changes made for the following reasons: As per submission, Move to Earthworks Chapter. Provides clarity – rule not about infrastructure per se, but EW from other activities
INF-R24 – provide greater nuance to buildings in National Grid Yards	Changes made for the following reasons: Changes made as per submission to provide clarity
Retain INF-S1, S2, S24	No changes needed
Amend INF-S3 to exclude Nat Grid from compliance and provide nuance for NY earthworks in Nat Grid Yard	Changes made for the following reasons: Yes in relation to nuance for Nat Grid yard, but no changes to exclude Nat Grid EW from 2,500m ² requirement. But consider upping this to 3000m ² to align with GWRC framework. Provides clarity and aligns with Regional Council provisions
Amend INF-S12 to make more specific	Changes made for the following reasons:

	Changes made as per submission to provide clarity
Wants INF-CE-P24 and INF-CE-P25 to have standalone policies	Changes made for the following reasons: Ongoing discussions
INF-CE-P26, P25, P26, P27, P28, P31 ensure they align with NPSET	Changes made for the following reasons: Ongoing discussions
INF-CE-R37 and 38 – delete reference to the National Grid as competes with NESETA	Changes made for the following reasons: As per submission - provides clarity and aligns with higher order document
INF-Ce-R39 – delete as already covered in NESETA	Changes made for the following reasons: As per submission to Provides clarity and aligns with higher order document
Retain INF-CE-P41	Changes made for the following reasons: Ongoing discussions
INF-ECO-P34, 35, 36 – need to give effect to the NPSET	Changes made for the following reasons: Ongoing discussions
INF-ECO-R45 – delete as already covered in NESETA	Changes made for the following reasons: Remove reference to National Grid and leave only in relation to gas transmission as Provides clarity and aligns with higher order document
INF-ECO-R46 – delete as already covered in NESETA	Changes made for the following reasons: As per submission to Provides clarity and aligns with higher order document
Retain INF-ECO-R48	No changes needed
INF-ECO-S21 – delete as already covered in NESETA	Changes made for the following reasons: Standard is for all Inf Ew in an SNA, so while NESETA exists, it does not cover all Inf providers.

Delete INF-NFL-P47, P48, P50, P51, P52, P53 as is inconsistent with NESETA	Changes made for the following reasons: Ongoing discussions
Not opposed to INF-NFL-P9, but query its need	Changes made for the following reasons: The policy encourages undergrounding or practicable infrastructure and as such should be retained
Delete INF-NFL-R54, and R55 as already covered by NESETA	Changes made for the following reasons: Ongoing discussions. R54 cannot be deleted as also provides for other infrastructure
Retain INF-NFL-R57	No changes needed
Adjust activity status of INF-NFL-R58 from NC to Dis	Changes made for the following reasons: Ongoing discussions
Delete INF-NFL-S22 as already covered by NESETA	Changes made for the following reasons: Ongoing discussions
Delete INF-NATC-P54 as is inconsistent with NESETA	Changes made for the following reasons: Ongoing discussions
Retain INF-NATC-R59	No changes needed
Amend INF-NH-R60, R61, and R62 to state the rules do not apply to the National Grid.	Changes made for the following reasons: Ongoing discussions
Adjust activity status of INF-NH-R63 from NC to Dis	Changes made for the following reasons: Ongoing discussions
INF-OL-P56 – provide clarity on the areas subject to the policy	Changes made for the following reasons: Ongoing discussions
Retain rules IN-OL-R64, 65, 67, 68 and 69	No changes needed
Retain the clarification that rules relating to infrastructure are contained within the infrastructure chapters	No changes made
Provide clarity as to the objs and pols in natural hazards applicability to infrastructure	Changes made for the following reasons: Clarity should be provided and that NH chapters do not apply to

		Inf – rather that should be covered by INF-NH subchapter
WCC Transport Team Review by Abley	INF-S14 – explicitly state that this applies to new roads only	Changes made for the following reasons: Explained through INF-R30(2)
	Make INF-S14 a typical layout not a prescribed layout	Changes made for the following reasons: The cross sections are labelled as Typical Plan and Cross Section, not Prescribed
	INF-S14 remove statement that roads must provide for two-way traffic	Changes made for the following reasons: Remove statement as confusing – two way roads are achieved through meeting table requirements. Helps to provide clarity
	INF-S14 – overall widths would be more appropriate as round numbers	Changes made for the following reasons: The overall minimum widths are a function of the inputs
	INF-S14 –The provision for cyclists on low roads is to share the traffic lanes. Sharrow markings can be helpful	Changes made for the following reasons: Matter for detailed design
	INF-S14 –No reference to rain gardens	Changes made for the following reasons: Add stormwater management as an example of what can occur in this space. Helps to provide clarity
	INF-S14 –note footpath width includes kerb face	No changes made for the following reasons: Ongoing discussions
	INF-S14 Local Street Footpath width should be 1.8m to align with NZTA Pedestrian Network Guidance	Changes made for the following reasons: As per submission to align with national guidance documents
	INF-S14 Local Street M5 P3 – traffic lanes should be 3m not 2.9m	Changes made for the following reasons: As per submission to provide and additional passing factor
INF-S14 Local Street M5 P4 – indented parking lanes should be 2.2m	Changes made for the following reasons:	

	As per submission to provide for ease of access and egress to parking pays
INF-S14 Local Street M4 P3 and P4 – indented parking lanes very wide at 2.6m. Could be 2.2m	Changes made for the following reasons: 2.6m allows additional safety for bikes using road
INF-S14 Local Street M4 P3 and P4 – bike lane widths should be increased to 1.8m	Changes made for the following reasons: As per submission to align with national guidance documents
INF-S14 Activity Street – indented parking at 2.6m too wide (2.2m appropriate), but if used as a bus stop then too narrow (2.7m).	Changes made for the following reasons: Intent is for this space to be flexible in its use. 2.6m provides for this flexibility