



SUBMISSION BY POWERCO LIMITED ON THE PROPOSED PORIRUA DISTRICT PLAN

To: Proposed District Plan
Environment and City Planning
Porirua City Council
PO Box 50-218
Porirua City

Email: dpreview@poriruacity.govt.nz

From: Powerco Limited (**Powerco**)
Private Bag 2061
New Plymouth
(Note that this is not the address for service.)

1. This is a submission by Powerco Limited on the Proposed Porirua District Plan.
2. The reasons for Powerco's submission are set out in the attached schedule (**Schedule 1**). In summary, this submission seeks to ensure recognition, protection and continued access to existing assets, enabling provision for new infrastructure, and that inappropriate development in, around and close to our assets is avoided. Powerco has outlined what we support and where we request changes to the objectives, policies, rules, standards and definitions.
3. Powerco's comments are focused on key matters of concern. Powerco reserves the right to comment further on draft objectives, policies and rules as the District Plan develops.

4. Powerco wishes to be heard in support of this submission.
5. If others make a similar submission, Powerco would be prepared to consider presenting a joint case at any hearing.
6. Powerco could not gain an advantage in trade competition through this submission.

Dated at Tauranga this 20th day of November 2020.

Signature of person authorised to sign on behalf of Powerco Limited:



.....
Gary Scholfield
Environmental Planner

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Schedule 1 – Submission by Powerco

REASON FOR POWERCO'S SUBMISSION

1. Introduction

- 1.1. This submission has been prepared on behalf of Powerco Limited (**Powerco**). Powerco is New Zealand's largest electricity and second largest gas distributor in terms of network length, and has been involved in energy distribution in New Zealand for more than a century. The Powerco network spreads across the upper and lower central North Island servicing over 440,000 consumers. This represents 46% of the gas connections and 16% of the electricity connections in New Zealand.
- 1.2. Powerco is a "Lifeline Utility" as described in Part B of Schedule 1 of the Civil Defence Emergency Management Act 2002, as we are an entity that distributes both natural gas and electricity through a network. Our networks are also recognised as "Regionally Significant Infrastructure" within the Wellington Regional Policy Statement (**WRPS**).
- 1.3. Powerco has a large network of gas distribution assets within the Porirua region, as shown on the maps in **Appendix A** to this submission, and therefore has an interest in the Proposed Porirua District Plan. In particular, Powerco is interested in the approach Council intends to take on the management of network utilities in the proposed District Plan. The existing gas distribution network needs to be operated, repaired, maintained and upgraded, and when required new gas distribution network infrastructure needs to be installed.
- 1.4. Powerco's gas assets include a network of underground gas distribution pipelines and associated infrastructure throughout the Porirua district. The gas distribution network comprises distribution main pipelines (normally steel pipes) that transport gas from the gas transmission system to each service main, and service pipelines (normally PE pipes) which transport gas from the main to the customer, ending at the meter control valve at a customer's point of connection. Gas distribution pipelines have diameters ranging from 23mm to 300mm.

- 1.5. The gas distribution network uses district regulator stations (**DRS**), an installation designed to reduce the pressure of gas to a lower pressure for use by customers within a particular area. DRSs are typically above ground structures (although these can be underground) which can be a range of sizes from 1m² to 20m². DRSs can include regulators, filters, valves, SCADA equipment, vents and are located within a cabinet or enclosure, and are normally located in road reserve.
- 1.6. Valves are also required to regulate, direct or control the flow of gas by opening, closing, or partially obstructing the pipes. Valves fit inline with the pipelines, and to allow access for operation and maintenance purposes have a small manhole 20cm x 20cm to large pits of 5m x 5m normally located in road reserve. Smaller valves can be installed on buildings (with a regulator, gas meter and cover) associated with customer connections - at times these may be installed on heritage buildings / items.
- 1.7. Cathodic protection systems (**CPS**) are applied to buried metallic assets on our network and assist with maintaining the assets' condition. Cathodic protection serves as a secondary protection system when the protective coating on an asset fails. CPS are used as a corrosion inhibiting system that ensures buried metallic pipelines are permanently cathodic (i.e. electrically negative to the surrounding soil). CPS predominately comprise underground components (anode beds connected to the pipeline) although rectifiers (electrical devices) may need to be installed above ground to generate sufficient current for protection to occur.
- 1.8. Underground anode earth beds can also be installed to earth steel pipelines to mitigate hazardous voltages being impressed on to the pipeline from electrical faults or lightning strike – these are different to those used for CPS.
- 1.9. Gas distribution pipelines also need to cross rivers and streams, and need to be located everywhere a customer chooses to locate including in overlays (sometimes in areas such as Outstanding Natural Areas and Special Amenity Landscapes) and areas subject to contaminated land and natural hazards.
- 1.10. The gas distribution network is predominantly located within roads. Street trees negatively impact the operation and maintenance of existing gas distribution pipelines as they can interfere with or damage underground assets and increase the difficulty and cost of routine

maintenance activities. Their location can also limit options for the alignment of new infrastructure. Where possible, street trees should not be planted over or too close to existing gas distribution pipelines. The problem is exasperated where the street tree is also a notable tree.

1.11. A reliable and constant energy supply is critical to sustaining the regional economy, population and way of life. Demand for energy is constantly increasing. Powerco faces an increasing number of constraints, in terms of providing a secure and reliable supply of energy to meet the increasing demand and population growth.

1.12. It is critical that the planning documents that guide development within the Porirua District adequately provide for the core strategic infrastructure that is required to support growth. Unless these issues are appropriately addressed, the WRPS will not be given effect to and the sustainable management purpose of the RMA will not be promoted. Powerco's submission is therefore that the District Plan should be drafted to ensure:

- The sustainable management of Powerco's assets as a physical resource;
- Effect is given to the policies of the WRPS;
- Appropriate provision is made for the on-going operation, repair and maintenance of Powerco's network, including ensuring that pipelines can be accessed;
- Appropriate provision is made for the existing network to be upgraded in order to meet energy growth demands;
- Appropriate provisions for new pipelines as and when required;
- Protection of the existing network from issues of reverse sensitivity; and
- Maintenance of amenity and public safety around gas pipelines.

1.13. In all cases, suggested changes are marked as additions (bold and underlined) and deletions (strikethrough).

2. General comments

2.1. The WRPS details how activities involving regionally significant infrastructure and renewable energy will be addressed. It recognises that some infrastructure is regionally important (including Powerco's gas distribution network) and that the social, economic, cultural and environmental benefits of such infrastructure are recognised and protected. It is therefore

appropriate, given the local and regional significance of Powerco's network within the District, that its management is comprehensively and appropriately addressed in the Proposed Porirua District Plan (**PDP**).

- 2.2. The importance of the functional, operational, technical and locational requirements of network utilities needs to be recognised throughout the PDP. Network Utilities are often required to be located within certain areas / environments to maintain their functional, operational, technical and locational needs to service communities.
- 2.3. Powerco supports the separate Infrastructure Chapter covering network utilities set out in the PDP. Considering utilities on a district-wide basis and containing all rules in a separate section assists plan administration and enable both network utility operators and the community to be able to easily determine the status of an activity. The last paragraph of the introduction section in the Infrastructure Chapter clearly sets out that the objectives, policies and rules in the Infrastructure Chapter and the Strategic Direction objectives only apply to infrastructure activities, and that the only objectives, policies and rules that apply to infrastructure activities in other chapters are Contaminated Land, Hazardous Substances and Renewable Energy Generation. Powerco supports this clarity.
- 2.4. **Table 1** contains a detailed list of submission points that Powerco wishes to make on the PDP.

Table 1

Objective / Policy / Rule	Provision	Position	Reason for position	Relief Sought - Amendments emboldened in underline and strike through
Definitions				
Construction activity		Support	Excludes building work associated with infrastructure	Retain as notified.
Functional need		Support	Powerco supports the NPS definition of functional need	Retain as notified.
Heritage alteration		Oppose	Does not address maintenance or upgrades of infrastructure located on heritage items or historic heritage sites	Amend the definition of Heritage alteration as follows: Heritage alteration of a heritage item or historic heritage site excludes:... <u>f. maintenance and repair or upgrading of infrastructure.</u>
Infrastructure		Support	Powerco supports the RMA definition of infrastructure	Retain as notified.
Maintenance and Repair		Support	Powerco supports this definition of maintenance and repair as it addresses the day to maintenance and repair activities that Powerco has to carry out for its existing gas assets within the district.	Retain as notified.
Minor Earthworks		Support	Powerco supports the definition including the installation and construction of service connections	Retain as notified.

Objective / Policy / Rule	Provision	Position	Reason for position	Relief Sought - Amendments emboldened in underline and strike through
Network Utility Operator		Support	Powerco supports the RMA definition of Network Utility Operator	Retain as notified.
Operational Need		Support	Powerco supports the NPS definition of Operational Need	Retain as notified.
Regionally Significant Infrastructure		Oppose	Powerco opposes the definition as it does not accommodate Powerco's gas distribution assets and recognise them as being regionally significant. This is inconsistent with the definition contained within the Wellington Regional Policy Statement which the District Plan must give effect to.	Amend the definition of regionally significant infrastructure as follows: Means regionally significant infrastructure including: a. pipelines for the distribution or transmission of <u>natural or manufactured gas or</u> petroleum; ...
Structure		Support	Powerco supports the NPS definition of Structure	Retain as notified.
Temporary Infrastructure		Support	Powerco supports the definition of Temporary Infrastructure	Retain as notified.
Trenching		Oppose in part	Powerco opposes in part, the definition of Trenching. Sometimes trenching will be associated with (or connect to) an	Amend the definition of Trenching as follows: Means the excavation of trenches for underground infrastructure, including the Three Waters Network, communications, electricity and gas transmission and distribution, and any other network utilities.

Objective / Policy / Rule	Provision	Position	Reason for position	Relief Sought - Amendments emboldened in underline and strike through
			above ground piece of infrastructure.	
Upgrading		Oppose in part.	Upgrading works are a necessity and common, and therefore clarity around this definition is important. As currently drafted it only applies to existing infrastructure meaning the ability to upgrade is significantly constrained.	Amend the definition of upgrading as follows: As it applies to infrastructure, means the improvement, relocation, replacement , or increase in carrying capacity, operational efficiency, size, pressure , security or safety of existing infrastructure, but excludes maintenance and repair.
Strategic Direction Chapters				
EP – 01 Eastern Porirua Regeneration	EP – 01	Support	Powerco supports co-ordinated development which includes infrastructure	Retain as notified.
FC – 01 Infrastructure	FC – 01	Support	Powerco supports effective, efficient, resilient and safe infrastructure	Retain as notified.
FC – 03 Existing activities	FC – 03	Support	Powerco supports the objective of protecting existing lawful activities from incompatible activities	Retain as notified.
FC – 04 Compatible activities	FC – 04	Oppose	Powerco supports compatible activities locating together, however this should recognise that infrastructure is needed everywhere a	Amend the Objective FC – 04 as follows: Compatible activities with similar effects and functions are located together in appropriate areas (where technically and operationally feasible for infrastructure) and:...

Objective / Policy / Rule	Provision	Position	Reason for position	Relief Sought - Amendments emboldened in underline and strike through
			customer chooses to locate	
HCH-01 Historic and Cultural Heritage	HCH-01	Oppose	At times infrastructure is required to be maintained and upgraded and new infrastructure is required to be installed to service the requirements of all buildings, sites and areas including those having historic and cultural heritage value.	Amend Objective HCH-01 as follows: The buildings, items, sites and natural features that have been identified as having special qualities and values and which contribute to Porirua and Ngati Toa Rangatira's sense of place and identity are protected and maintained <u>where practicable.</u>
HO – 02 Housing Density	HO – 02	Oppose	Housing density should also be enabled by having access to infrastructure	Amend Objective HO – 02 as follows: Higher density housing is enabled on greenfield and brownfield sites across the city where it: <ol style="list-style-type: none"> 1. Has access to the transport network and is served by multi-modal transport options; 2. Is located within or near a commercial centre and close to public open space; 3. Has access to social infrastructure; and 4. <u>Has sufficient infrastructure capacity; and</u> 5. Avoids areas of significant natural hazard risk.
REE – 02 Renewable energy and energy conservation	REE – 02	Oppose	Powerco opposes the absolute requirement to reduce reliance on non-renewable sources of energy within this objective, which would apply to Powerco's gas distribution networks	Amend Objective REE – 02 as follows: <u>Where possible and appropriate, there</u> is reduced reliance on non-renewable sources of energy, increased use of renewable sources of energy and greater energy conservation.

Objective / Policy / Rule	Provision	Position	Reason for position	Relief Sought - Amendments emboldened in underline and strike through
REE – 03 Resilience	REE – 03	Support	Powerco supports the objective that subdivision, use and development should not increase risks to people, property and infrastructure.	Retain as notified.
UFD – 04 Future Urban Areas	UFD – 04	Support	Powerco supports future urban growth areas being supported by infrastructure of sufficient capacity to accommodate the form and type of development. Without appropriate infrastructure, urban areas can't operate.	Retain as notified.
INF - Infrastructure Chapter				
Introduction				
INF – Infrastructure – Introduction	Introduction – paragraph 7	Support	Powerco supports the last paragraph of the Infrastructure Chapter Introduction. The explanation of how the plan works is necessary for clarity and ensures that users of the district plan understand which objectives, policies and rules apply to infrastructure activities.	Retain as notified (and repeated below): Note: Except as specifically identified in an objective, policy or rule, the objectives, policies and rules in this chapter and the Strategic Direction objectives, and those contained in the following chapters where relevant, are the only objectives, policies and rules that apply to infrastructure activities, and no objectives, policies and rules in other chapters apply: 1. Contaminated land; 2. Hazardous substances; 3. Renewable Electricity Generation.
Objectives				



Objective / Policy / Rule	Provision	Position	Reason for position	Relief Sought - Amendments emboldened in underline and strike through
INF – 01 The benefits of Regionally Significant Infrastructure	INF-01	Support	Powerco supports this objective as ensures the benefits of Regionally Significant Infrastructure are recognised and provided for.	Retain as notified.
INF-02 The protection of Regionally Significant Infrastructure	INF-02	Support	Powerco supports this objective as ensures that Regionally Significant Infrastructure is protected from adverse effects including reverse sensitivity effects.	Retain as notified.
INF-03 – Availability of infrastructure to meet existing and planned needs	INF-03	Support	Powerco supports this objective as it highlights the need to ensure the ability to provide infrastructure in order to meet the needs of existing and planned subdivision use and development.	Retain as notified.
INF-05 – Providing for infrastructure	INF-05	Support	Powerco support the recognition of the benefits and importance of infrastructure	Retain as notified.
Policies				
INF- P1 The benefits of Regionally Significant Infrastructure	INF – P1	Support	Powerco supports this policy, as it highlights the regional significance of	Retain as notified.

Objective / Policy / Rule	Provision	Position	Reason for position	Relief Sought - Amendments emboldened in underline and strike through
			infrastructure and its importance.	
INF-P2 – The benefits of infrastructure other than Regionally Significant Infrastructure	INF-P2	Support	Powerco supports this policy as it recognises the benefits and importance of infrastructure	Retain as notified.
INF-P3 – Infrastructure for planned future growth	INF-P3	Support	Powerco supports this policy as it recognises the need to ensure availability of infrastructure.	Retain as notified.
INF-P4 – Appropriate infrastructure	INF-P4	Oppose in part	Powerco supports the development and maintenance of infrastructure in all areas including Overlays, while taking into account environmental effects where practicable.	Amend policy INF - P4 as follows: Enable new infrastructure and the maintenance and repair, upgrading and removal of existing infrastructure, including earthworks, that: 1. Is of a form, location and scale that minimises adverse effects on the environment where practicable ; 2. Is compatible with the anticipated character and amenity values of the zone in which the infrastructure is located; and 3. For any maintenance and repair, or removal of existing infrastructure in any Overlay, it is of a nature and scale that does not adversely impact where practicable on the identified values and characteristics of the Overlay that it is located within.
INF – P5.4 – Adverse effects on Regionally Significant Infrastructure	INF – P5.4	Oppose	Powerco seeks gas distribution network to be included within the definition of Regionally Significant Infrastructure and as such the following	Amend INF – P5.4 as follows: 4. Requiring sensitive activities to be located and designed so that potential adverse effects of and on the Rail Corridor, and State Highways and the electricity and gas transmission and distribution networks are avoided, remedied or mitigated.

Objective / Policy / Rule	Provision	Position	Reason for position	Relief Sought - Amendments emboldened in underline and strike through
			amendment is required.	
INF – P5.6 – Adverse effects on Regionally Significant Infrastructure	INF – P5.6	Support	Powerco supports the consideration of effects on Regionally Significant Infrastructure when considering subdivisions	Retain as notified.
INF – P5.7 – Adverse effects on Regionally Significant Infrastructure	INF – P5.7	Support	Powerco supports the consideration of access to and operation of Regionally Significant Infrastructure when considering subdivisions	Retain as notified.
INF-P8 – Provide for Regionally Significant Infrastructure and other infrastructure outside of Overlays	INF-P8	Oppose in Part	Powerco supports the importance of infrastructure being located in all areas where its customers choose to locate, including in areas outside of Overlays. However, the requirement to minimise effects may not be possible in all circumstances. Likewise, the ability to ‘enhance’ public access to and along the coastal marine area and water bodies	Amend INF – P8 as follows: Provide for Regionally Significant Infrastructure and other infrastructure which is not located within an Overlay, where it can be demonstrated that the following matters can be achieved: 1. Compatibility with the site, existing built form and landform; 2. Compatibility with the anticipated character and amenity values of the zone it is located in; 3. Any adverse effects on amenity values are minimised avoided, remedied or mitigated , taking into account: a. The bulk, height, size, colour, reflectivity of the infrastructure; b. Any proposed associated earthworks; c. The time, duration or frequency of any adverse effects; and

Objective / Policy / Rule	Provision	Position	Reason for position	Relief Sought - Amendments emboldened in underline and strike through
			may not be achievable (nor appropriate).	<p>d. Any proposed mitigation measures;</p> <p>4. Any adverse effects on the health, wellbeing and safety of people, communities and the environment, including nuisance from noise, dust, odour emissions, light spill and sedimentation are avoided, remedied or mitigated;</p> <p>5. Any adverse effects on the natural character and amenity of water bodies, the coast and riparian margins and coastal margins are minimised;</p> <p>6. Public access to and along the coastal marine area and water bodies is maintained or enhanced;</p> <p>7. Any adverse effects on any values and qualities of any adjacent Overlays are minimised <u>avoided, remedied or mitigated</u>;</p> <p>8. The safe and efficient operation of any other infrastructure, including the transport network, is not compromised; and</p> <p>9. Any adverse cumulative effects are minimised <u>avoided, remedied or mitigated</u>.</p>
INF-P9 – Recognise operational needs and functional needs of infrastructure	INF-P9	Support	Powerco supports recognising the operational and functional needs of infrastructure.	Retain as notified.
INF – P11 – Electric and magnetic fields and radiofrequency fields	INF – P11	Support	Powerco supports this policy as it encourages network utilities to meet the national environmental standards and nationally recognised standards.	Retain as notified.
INF – P16 – Roads as infrastructure corridors	INF – P16	Support	Powerco supports this policy as it appropriately reflects the role of roads as	Retain as notified.

Objective / Policy / Rule	Provision	Position	Reason for position	Relief Sought - Amendments emboldened in underline and strike through
			infrastructure corridors.	
INF-P17 – Upgrades to existing infrastructure and new infrastructure within or on heritage items, heritage settings and historic heritage sites, and sites and areas of significance to Maori	INF-P17	Support	Powerco supports the importance of infrastructure being located in all areas where its customers choose to locate, including in areas including in particular historic heritage areas and areas of significance to Maori.	Retain as notified.
INF-P18 – Trimming, pruning and activities within the root protection area of notable trees	INF-P18	Support	Powerco supports the importance of being located in all areas where its customers choose to locate, including in areas with notable trees.	Retain as notified.
INF-P19 – Removal of Notable trees	INF-P19	Support	Powerco supports the importance of being located in all areas where its customers choose to locate, and where appropriate for meeting operational or functional need be able to removal Notable Trees.	Retain as notified.
INF-P20 – Upgrades to and new infrastructure in Significant Natural Areas	INF-P20	Support	Powerco supports the importance of being located in all areas where its customers choose to locate,	Retain as notified.

Objective / Policy / Rule	Provision	Position	Reason for position	Relief Sought - Amendments emboldened in underline and strike through
			including in Significant Natural Areas.	
INF-P21 – Upgrades to and new infrastructure in Special Amenity Landscapes	INF-P21	Oppose	Powerco seeks that the policy be amended to recognise that new infrastructure may only be able to minimise adverse effects due to technical and/or operational constraints.	Amend INF – P21.1 as follows: 1. Any significant adverse effects are avoided, and any other adverse effects are avoided, remedied or mitigated as far as reasonably practicable and the identified characteristics and values of the Special Amenity Landscapes described in SCHED10 – Special Amenity Landscapes are <u>maintained to the extent practicable</u> ; and
INF-P22 – Upgrades to and new infrastructure in an Outstanding Natural Features and Landscapes or Coastal High Natural Character Areas	INF-P22	Support	Powerco supports recognition in the policy that operational or functional needs for the location of new infrastructure may mean there is no suitable alternative to locating within an outstanding natural feature or landscape and seeks retention of the policy.	Retain as notified.
INF-P23 – Upgrades to and new infrastructure in Natural Hazard Overlays and Coastal Hazard Overlays	INF-P23	Support	Powerco supports the importance of being located in all areas where its customers choose to locate, including in Natural Hazard Overlays and Coastal Hazard Overlays.	Retain as notified.
INF-P26 – Signs	INF-P26	Support	Powerco supports enabling signs	Retain as notified.

Objective / Policy / Rule	Provision	Position	Reason for position	Relief Sought - Amendments emboldened in underline and strike through
			associated with infrastructure.	
Rules				
INF – R1 – Infrastructure involving radiofrequency fields and electric and magnetic fields	INF – R1	Support	Powerco supports the permitted activity for infrastructure complying with national standards.	Retain as notified.
INF – R2 – Noise from construction of new infrastructure and the maintenance and repair, upgrading and removal of existing infrastructure	INF-R2	Oppose	This rule only refers to measurement, assessment and control but doesn't contain any specific performance requirements.	Delete in its entirety.
INF-R3 – The maintenance and repair and removal of existing infrastructure, including any existing ancillary vehicle access tracks, outside of any Overlay	INF-R3	Support	Powerco supports the repair and maintenance of existing infrastructure outside of any Overlay	Retain as notified.
INF-R4 – Upgrading of existing infrastructure, excluding roads, gas transmission pipelines and transmission lines	INF-R4	Support	Powerco supports the upgrading of existing infrastructure rules	Retain as notified.

Objective / Policy / Rule	Provision	Position	Reason for position	Relief Sought - Amendments emboldened in underline and strike through
INF-R5 – The maintenance and repair and removal of existing infrastructure including any existing ancillary vehicle access tracks, within any Overlay	INF-R5	Support	Powerco supports the maintenance and repair and removal of existing infrastructure within any Overlay.	Retain as notified.
INF – R6 – Upgrading of existing infrastructure which is located on or within a heritage item, heritage setting, or historic heritage site identified in SCHED2 – Historic Heritage Items (Group A), SCHED3 – Historic Heritage Items (Group B), SCHED4 – Historic Heritage Sites or sites and areas identified in SCHED6 – Sites and Areas of Significance to Maori	INF – R6.1	Oppose	Powerco needs the ability to replace and upgrade existing gas lines, valves, regulators and meters on the outside of buildings. As the activity is existing, it should be permitted.	Amend INF - R6.1 as follows: 1. Activity status: Permitted Where: a. The infrastructure is an antenna; and <u>b. the infrastructure is a gas line, regulator, meter, valve or meter cover; and</u> c. Compliance is achieved with INF – S2
INF-R7 – Upgrading of infrastructure, excluding roads,	INF-R7.1	Support	Powerco supports the permitted activity applying to	Retain as notified.

Objective / Policy / Rule	Provision	Position	Reason for position	Relief Sought - Amendments emboldened in underline and strike through
gas transmission pipelines and transmission lines over 110kV located in an area identified in SCHED10 – Special Amenity Landscapes or SCHED11 – Coastal High Natural Character Areas			underground activities in Special Amenity Landscapes and Coastal High Natural Character Areas	
INF – R8 – Upgrading of infrastructure, excluding roads, gas transmission pipelines and transmission lines over 110kV, in a Natural Hazard Overlay or Coastal Hazard Overlay	INF – R8.1	Oppose in Part	The requirement for the footprint of existing infrastructure not to increase is opposed. It is considered that increases in footprint could occur without impacting on risks from hazards.	Amend INF – R8.1 as follows: 1. Activity status: Permitted Where: a. Compliance is achieved with: i. INF-S1; ii. INF-S14; iii. INF-S15; and iv. The noise rule(s) applying to the zone; and b. The infrastructure upgrade: i. Does not result in a permanent change to the ground level once the upgrade is completed; and ii. Any addition to existing infrastructure, structure or building located above ground level does not increase the footprint of the existing infrastructure, structure or building to the lesser of 10m2 or by no more than 50% .
INF-R11 – New infrastructure located within a Natural Hazard	INF-R11.1d	Support in Part	The ability to install infrastructure at times within a Natural Hazard Overlay or	Amend INF – R11.1d as follows: 1(d) The infrastructure is above ground and is located above ground within the: ...



Objective / Policy / Rule	Provision	Position	Reason for position	Relief Sought - Amendments emboldened in underline and strike through
<p>Overlay or Coastal Hazard Overlay, excluding roads, walkways, cycleways and shared paths, gas transmission pipelines and transmission lines and new transformers, substations, switching station and ancillary buildings for the electricity network, and water and wastewater treatment plants</p>			<p>Coastal Hazard Overlay is required. However there seems to be some duplication of text in 11.1d.</p>	
<p>INF-R13 – Infrastructure located within existing buildings</p>	<p>INF-R13</p>	<p>Oppose in Part</p>	<p>Powerco considers that infrastructure located “on” existing buildings should also be permitted. Gas distribution infrastructure associated with customer connections is often installed on the exterior of buildings (e.g. gas line, regulator, meter, valve, meter cover).</p>	<p>Amend the rule title for INF-R13 as follows: INF-R13 - Infrastructure located <u>on or</u> within existing buildings</p>
<p>INF-R14 – Infrastructure located on or within</p>	<p>INF-R14</p>	<p>Support</p>	<p>Powerco supports the permitted activity status for</p>	<p>Retain as notified.</p>

Objective / Policy / Rule	Provision	Position	Reason for position	Relief Sought - Amendments emboldened in underline and strike through
existing bridges and structures across streams			Infrastructure located on or within existing bridges and structures across streams	
INF-R15 – Underground infrastructure, excluding gas transmission pipelines and transmission lines over 110kV, outside of any Overlay	INF-R15	Support	Powerco supports the permitted activity for undergrounding gas distribution pipelines outside of any Overlay	Retain as notified.
INF – R20 – Temporary infrastructure and temporary electricity generators and self-contained power units to supply existing infrastructure, excluding roads and ancillary access tracks, outside of any Overlay.	INF – R20	Support	Powerco supports the permitted activity for temporary infrastructure. When work is undertaken on the gas distribution network, temporary bypasses are often utilised to ensure continuity of gas supply.	Retain as notified.
INF-R24 – Signs associated with the construction, operation, maintenance and repair, or upgrading of infrastructure	INF-R24	Support	Powerco supports this rule as it is appropriate that certain signage is permitted for infrastructure projects.	Retain as notified.
INF-R26 – Infrastructure not otherwise provided	INF-R26	Support	Powerco supports this rule as it provides for	Retain as notified.

Objective / Policy / Rule	Provision	Position	Reason for position	Relief Sought - Amendments emboldened in underline and strike through
for or subject to any other rule in this table			activities not otherwise provided for	
INF-R39 – Upgrading of infrastructure, excluding roads and walkways, cycleways and shared paths, located in an area identified in SCHED7 – Significant Natural Areas	INF-R39	Oppose	Powerco opposes that all upgrades to existing infrastructure automatically require resource consent – certain upgrades could occur without having impacts on Significant Natural Areas.	Amend rule INF-R39 so that upgrades that have no or very little potential impact on Significant Natural Areas are permitted.
INF-R40 – Upgrading of infrastructure and new infrastructure including any ancillary vehicle access tracks, excluding roads, walkways, cycleways and shared paths, located in the root protection area of a tree listed in SCHED5 – Notable Trees	INF-R40	Oppose	Powerco opposes that all upgrades to existing infrastructure automatically require resource consent – certain upgrades could occur without having impacts on Notable Trees.	Amend rule INF-R40 so that upgrades that have no or very little potential impact on Notable Trees are permitted.
Standards				
INF-S1 – Upgrading	INF-S1.1	Support	Powerco supports the realignment, relocation or replacement of any	Retain as notified.

Objective / Policy / Rule	Provision	Position	Reason for position	Relief Sought - Amendments emboldened in underline and strike through
			pipe or ancillary structure within 5m of the existing alignment or location.	
	INF-S1.11	Support	Powerco supports the diameter of replacement pipes aboveground must not exceed the diameter of the replaced pipe by more than 300mm.	Retain as notified.
	INF-S1.12	Oppose	This standard essentially captures all other upgrades – including underground gas infrastructure, which should be excluded from the standard.	Amend INF-S1.12 as follows: 12. The realignment, relocation or replacement of any other infrastructure structure or building <u>(excluding underground gas infrastructure)</u> : a. Must be within 5m of the alignment or location of the original structure or building; b. Must not increase the footprint of structure or building as of 28 August 2020 by greater than 30%.
INF – S2 – Upgrading – In relation to historic heritage and sites and areas of significance to Maori	INF – S2	Oppose	Powerco needs the ability to replace and upgrade existing customer connections installed on the side of buildings (gas line, regulator, meter or valve). Therefore a further permitted standard is required.	Amend INF-S2 as follows: 1. The colour of a replacement antenna must be the same colour as the building or structure 2. A replacement panel antenna must not increase the face area as of 28 August 2020 by more than 20% 3. A replacement dish antenna must not increase in diameter as of 28 August 2020 by more than 20% <u>4. Any replacement gas meter cover must not increase in size by more than 30%.</u>
INF – S8 – Cabinets, electric vehicle charging stations, temporary infrastructure and	INF-S8	Oppose	It is appropriate that Cabinets can be located in road reserve as they enclose important components	Amend INF-S8 as follows: 1. It must not exceed a maximum height above ground level of <u>2.2</u> m. 2. It must not exceed a maximum area of <u>24</u> m ² .

Objective / Policy / Rule	Provision	Position	Reason for position	Relief Sought - Amendments emboldened in underline and strike through
temporary electricity generators and self-contained power units to supply existing infrastructure, and any other infrastructure structure or building not otherwise listed, which are located in road reserve or rail corridor.			of infrastructure. However, the limits are too restrictive to allow for the range of above ground structures that are typically encountered within the road corridor.	<ol style="list-style-type: none"> 3. It must not exceed a maximum height above ground level of 4.92m. 4. It must not exceed a maximum area of 4.42m².
INF – S9 - Cabinets, electric vehicle charging stations, temporary infrastructure and temporary electricity generators and self-contained power units to supply existing infrastructure, and any other infrastructure structure or building not otherwise listed, which are not located in road reserve or rail corridor.	INF-S9	Support	It is appropriate that larger Cabinets and structures can be located in all zones outside of the road reserve or rail corridor.	Retain as notified.
INF – S11 – Setbacks – Infrastructure that is not located in the	INF-S11	Oppose	The requirement to be located outside a riparian margin (20m each side of a river 3m	Amend standard INF-S11 as follows: <ol style="list-style-type: none"> 1. It must not be located within a riparian margin or coastal margin <u>unless it is located underground.</u>



Objective / Policy / Rule	Provision	Position	Reason for position	Relief Sought - Amendments emboldened in underline and strike through
road reserve or rail corridor, excluding infrastructure that crosses a river along a bridge or structure			wide) is unreasonable particularly for underground infrastructure.	
INF – S13 – Setbacks – Cabinets, electric vehicle charging stations and temporary infrastructure and temporary electricity generators and self-contained power units to supply existing infrastructure, meteorological enclosures and buildings and any other infrastructure structure or building not otherwise listed, which is not located within the road reserve or rail corridor	INF-S13	Oppose	The requirement to be located 2m from any site boundary imposes an unreasonable requirement.	<p>Amend standard INF-S13 as follows:</p> <ol style="list-style-type: none"> 1. It must not be located within a 2m setback from any site boundary <u>that directly adjoins a sensitive activity unless it is adequately screened from view.</u> <p><u>This standard does not apply to underground infrastructure or the boundary with the road.</u></p>
INF – S14 – Earthworks – slope, height, depth and location	INF – S14.2	Oppose	This standard should also exempt holes drilled by an auger, which are sometimes used to install protection systems associated with gas	<p>Amend standard INF-S14.2 as follows:</p> <ol style="list-style-type: none"> 2. Earthworks must not exceed 1.5m in cut height or fill depth, except: <ol style="list-style-type: none"> a. Where the earthworks are for trenching <u>or augured holes</u> for the construction, operation, maintenance

Objective / Policy / Rule	Provision	Position	Reason for position	Relief Sought - Amendments emboldened in underline and strike through
			pipelines. Furthermore, earthworks can be associated with the installation of above ground infrastructure which should also be exempt.	and repair, removal or upgrade of underground infrastructure; and or b. Where the earthworks are associated with switchback sections for the development of new and maintenance of existing walkways, cycleways and shared paths that are located on public land other than a road.
	INF – S14.3	Oppose	This standard should exempt holes that are drilled by an auger and the installation of infrastructure by directional drilling. Furthermore, earthworks can be associated with the installation of above ground infrastructure which should also be exempt.	Amend standard INF-S14.3 as follows: 3. Earthworks must not be located within 1.0m of the site boundary, measured on a horizontal plane except: a. Where the earthworks are for trenching, <u>directional drilling or augured holes</u> for the construction, operation, maintenance and repair, removal or upgrade of underground infrastructure; or b. Where the site boundary separates adjoining sites which are both within the area of land subject to the proposed works.
	INF – S14.4	Oppose	In some cases, trenching may need to exceed 1m in depth to avoid other infrastructure or obstacles. A depth of 1.5m is considered more appropriate.	Amend standard INF-S14.4 as follows: 4. Trenching for the construction, operation, maintenance and repair, removal or upgrade of underground infrastructure undertaken within 1.0m of the site boundary must not exceed 1.05m in depth.
	INF – S14.6	Oppose	Installation of infrastructure beneath a stream or river by directional drilling should also be exempt from Standard S14.6.	Amend standard INF-S14.6 as follows: 6. Earthworks must not be carried out within 5m of a river, except: a. Where the earthworks are for the installation, maintenance and repair, removal or upgrade of

Objective / Policy / Rule	Provision	Position	Reason for position	Relief Sought - Amendments emboldened in underline and strike through
				infrastructure located on or within existing bridges or structure crossing a stream, <u>or</u> b. <u>The earthworks are for the installation of infrastructure by directional drilling.</u>
	INF – S14 exemptions	New exemption sought	Minor earthworks (a defined term) includes earthworks for the installation and construction of service connections which should be exempt from the Standards of S14	This standard does not apply to: <ul style="list-style-type: none"> • <u>Minor Earthworks</u>
INF – S15 – Earthworks – Area limit in a 12 month period per site, excluding the road reserve and rail corridor	INF – S15.1	Oppose	This standard should exempt holes that are drilled by an auger and the installation of infrastructure by directional drilling. Furthermore, earthworks can be associated with the installation of above ground infrastructure which should also be exempt.	Amend standard INF-S15.1 as follows: 1. No area limits apply to earthworks required for trenching, <u>directional drilling or augured holes</u> for the construction, operation, maintenance and repair, removal or upgrade of underground infrastructure where the trenching: a. Is undertaken by Porirua City Council or a network utility operator, or a nominated contractor or agent; b. Does not result in an increase in height of the ground level upon completion of the works; and c. Is progressively closed so that no more than 120m of trench is open at any time.
INF – S16 – Earthworks - in relation to Historic Heritage and Sites and Areas of Significance to Maori	INF – S16	Oppose	Earthworks are sometimes required to facilitate a new customer connection which should be provided for within this standard.	Amend standard INF-S16 as follows: 1. The earthworks are limited to trenching less than 600mm in width directly above existing underground infrastructure, <u>or</u> 2. <u>The earthworks are associated with the installation of a customer connection.</u>
INF – S18 – Trimming, pruning or removal of	INF – S18	Support	This standard for trimming, pruning or removal of indigenous	Retain as notified.

Objective / Policy / Rule	Provision	Position	Reason for position	Relief Sought - Amendments emboldened in underline and strike through						
indigenous vegetation within an area identified in SCHED7 – Significant Natural Areas			vegetation within a Significant Natural Areas is appropriate.							
INF – S19 - Trimming, pruning or removal or works within the root protection area of a tree identified in SCHED5 – Notable Trees	INF – S19	Support	This standard for trimming, pruning, removal or works within the root protection area of a Notable Tree is appropriate.	Retain as notified.						
INF – S20 – Earthworks within an area identified in SCHED7 – Significant Natural Areas	INF – S20	Support	Appropriate earthworks provided within a Significant Natural Area.	Retain as notified.						
INF – S21 – Signs	INF – S21	Support	Appropriate provision for infrastructure signage	Retain as notified.						
INF – Table 2 – Street Trees	INF – Table 2 – Horizontal Setback from underground infrastructure in relation to Distribution gas pipelines	Oppose	The minimum horizontal setback distances are inadequate to reasonably protect underground services from tree-root damage and will also increase costs associated with installing or accessing underground assets.	Amend INF – Table 2 – Horizontal Setback from underground infrastructure (m) in relation to distribution gas pipelines as follows: <table border="1" data-bbox="1377 1093 2027 1161"> <tr> <td><300mm</td> <td>300-600mm</td> <td>>60mm</td> </tr> <tr> <td>0.53.0</td> <td>4.53.0</td> <td>3.0</td> </tr> </table> <p>In addition, add a requirement for all street trees to have root guards / barriers installed.</p>	<300mm	300-600mm	>60mm	0.5 3.0	4.5 3.0	3.0
<300mm	300-600mm	>60mm								
0.5 3.0	4.5 3.0	3.0								
Natural Hazards Chapter										

Objective / Policy / Rule	Provision	Position	Reason for position	Relief Sought - Amendments emboldened in underline and strike through
NH – P2 – Hazard – Sensitive Activities and Potential – Hazard – Sensitive Activities within the High Hazard Areas	NH – P2	Support	At times infrastructure needs to locate in all areas subject natural hazards due to operational or functional need, including High Hazard Areas.	Retain as notified.



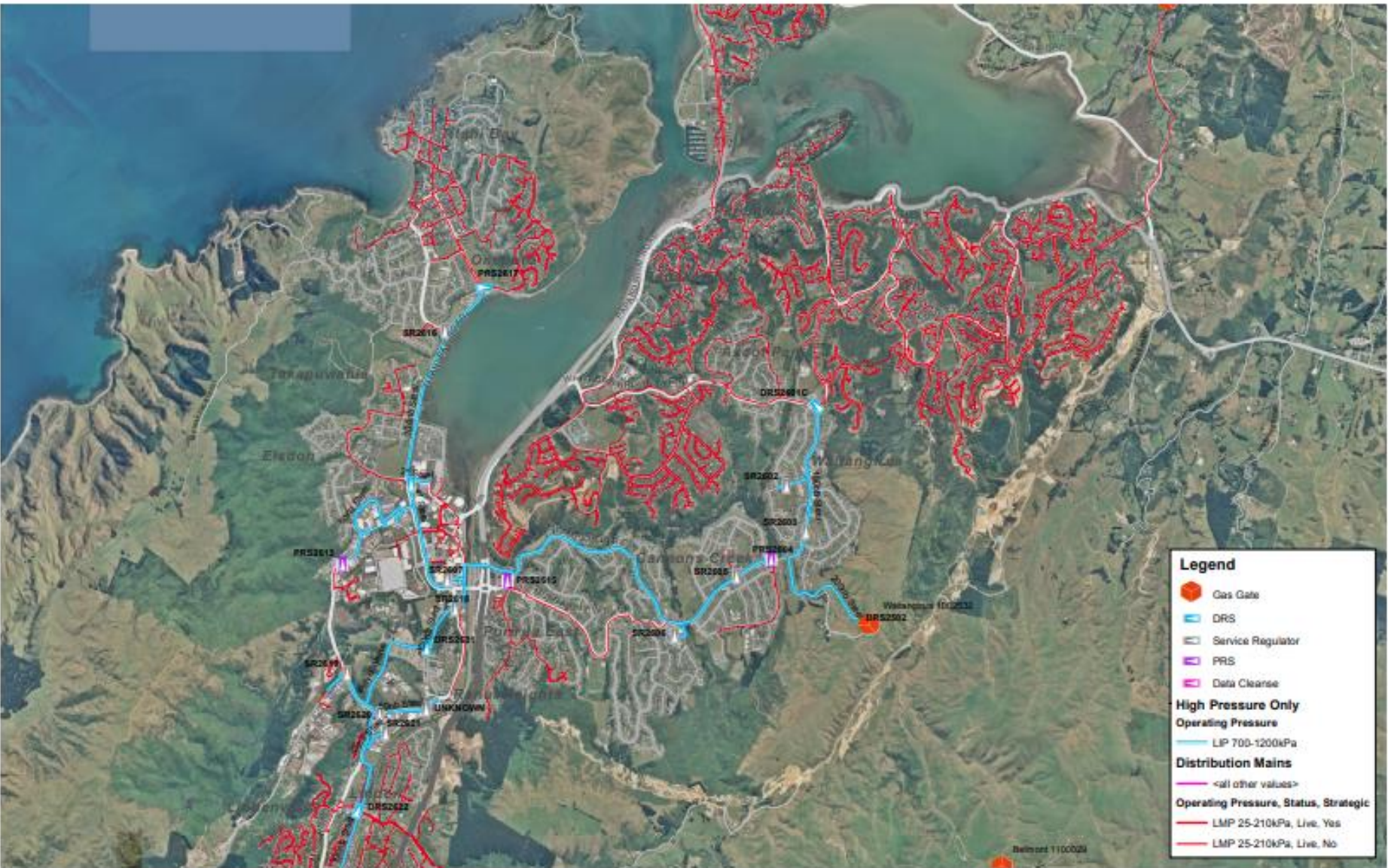
Appendix A- Powerco assets within the Porirua District boundaries





Powerco Gas Assets in Northern Porirua
November 2020





Powerco Gas Assets in Southern Porirua

November 2020

