



**FURTHER SUBMISSIONS 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@porirucity.govt.nz](mailto:dpreview@porirucity.govt.nz)

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

1. This is a further submission by Powerco Limited on the Proposed Porirua District Plan.
2. Powerco has an interest in the Proposed Porirua District Plan greater than the interest of the general public as it owns and operates the gas distribution network which is located throughout the wider Porirua District.
3. Details of the submitters, the particular submission points that Powerco supports or opposes and reasons are set out in Schedule 1.
4. Powerco wishes to be heard in support of these further submissions.
5. If others make similar submissions, Powerco would be prepared to consider presenting a joint case at any hearing.



Dated at Tauranga this 11<sup>th</sup> day of May 2021.

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



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Gary Scholfield

Environmental Planner

**ADDRESS FOR SERVICE:**

Powerco Limited

PO Box 13 075

Tauranga 3141

Attention: Gary Scholfield

Phone: 07 928 5659

Email: [planning@powerco.co.nz](mailto:planning@powerco.co.nz)

**Schedule 1 – Further submissions by Powerco**

The specific submission(s) on the Proposed Porirua District Plan that this further submission relates to:

Submission point number	Name of submitter	Plan provision	Support or Oppose	Reason	Decision sought
60.40	Transpower Limited	INF-P10	Support	A policy is required to recognise the benefits of new technology in infrastructure (such as innovation in meters). It is therefore appropriate that the policy be retained.	Accept the relief sought.
60.127	Transpower Limited	Introduction	Support	It is appropriate that the introduction of the Infrastructure Chapter is retained to ensure clarity of the relationship of the infrastructure chapter to other chapters, and by provision of relevant objectives, policies and methods relating to infrastructure in one section of the proposed district plan.	Accept the relief sought.
81.251	Kainga Ora	INF-P5.6 INF-P5.7	Oppose	Subdivision of land can lead to a number of constraints being imposed on existing infrastructure: earthworks can increase or decrease cover over assets; inappropriate landscaping can be installed over or near assets; reverse sensitivity effects can be	Reject the relief sought



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				created when incompatible activities are enabled; and restrictions can be imposed on access to assets. It is appropriate that these types of effects are considered at the subdivision stage.	
81.254	Kainga Ora	INF-P8	Support	It is not always possible to install infrastructure that is compatible with the anticipated character and amenity value of the zone that it is located in. Infrastructure by its nature cannot always be compatible with the planned urban form and environment.	Accept the relief sought.
81.262	Kainga Ora	INF-P16	Oppose	It is appropriate to retain policy 16 that enables the use of roads as infrastructure corridors in accordance with the National Code of Practice for Utility Operators' Access to Transport Corridors 2019, being a legislative requirement under the Utilities Access Act 2010.	Reject the relief sought.



Submission point number	Name of submitter	Plan provision	Support or Oppose	Reason	Decision sought
85.13	Wellington Electricity Lines Limited	Introduction	Support	Amendment to introduction to provide that infrastructure is a necessary, unavoidable and normal part of urban and rural environments is needed. It is appropriate that key messages are presented clearly and consistently within the district plan.	Accept the relief sought.
216.47	Queen Elizabeth the Second National Trust (QEII)	INF-R5	Oppose	At times new infrastructure may be required to be installed within a wetland or within the setback of a wetland. Consistent with the NES for Freshwater Management, new infrastructure to be located within a wetland or a setback of a wetland should remain as a discretionary activity.	Reject the relief sought.
225.30	Royal Forest and Bird Protection Society	General	Oppose	Network utility infrastructure is located wherever a customer chooses to locate. At times, network utility infrastructure needs to be located within or traverse through areas subject to overlays, contaminated land	Reject the relief sought.



Submission point number	Name of submitter	Plan provision	Support or Oppose	Reason	Decision sought
				<p>and hazards. It is therefore appropriate that a standalone network utility chapter has been developed that can be used by all network utility providers.</p> <p>It is not appropriate to amend the infrastructure chapter by restricting it to apply only to Regionally Significant Infrastructure. The infrastructure chapter is not incompatible with the Council's s6(c) RMA obligations.</p>	
225.31	Royal Forest and Bird Protection Society	General	Oppose	<p>The submission seeks to split up the infrastructure chapter into 'Regionally Significant Infrastructure' and 'infrastructure'. Distribution networks need to be everywhere that a customer chooses to locate. Even a single connection can be regionally significant (e.g. to a hospital). All network utility infrastructure should be dealt with the same, as 'infrastructure'. Having separate chapters for</p>	Reject the relief sought.



Submission point number	Name of submitter	Plan provision	Support or Oppose	Reason	Decision sought
				'Regionally Significant Infrastructure' and 'infrastructure' is therefore not supported.	
225.69	Royal Forest and Bird Protection Society	Definition – Regionally Significant Infrastructure	Oppose	The definition put forward by the submitter is not appropriate as the substitute definition does not include gas distribution infrastructure. This is inconsistent with the definition of Regionally Significant Infrastructure contained within the Wellington Regional Policy Statement which the District Plan must give effect to.	Reject the relief sought.
225.102	Royal Forest and Bird Protection Society	General	Oppose	Network utility infrastructure is located wherever a customer chooses to locate. At times, network utility infrastructure needs to be located within or traverse through areas subject to overlays, contaminated land and hazards. It is therefore appropriate that a high use standalone network utility chapter has been	Reject the relief sought.



Submission point number	Name of submitter	Plan provision	Support or Oppose	Reason	Decision sought
				<p>developed that can be used by all network utility providers.</p> <p>It is not appropriate to amend the infrastructure chapter by restricting it to apply only to Regionally Significant Infrastructure.</p>	
225.103	Royal Forest and Bird Protection Society	INF-O1	Oppose	<p>The additional text the submitter seeks 'in appropriate locations' is very subjective. An objective should be positively worded and clear enough to provide targets that policies seek to achieve.</p>	Reject the relief sought.
225.104	Royal Forest and Bird Protection Society	INF-O3	Oppose	<p>The submission seeks to alter the infrastructure chapter so it only applies to 'Regionally Significant Infrastructure'. Distribution networks need to be everywhere that a customer chooses to locate. Even a single connection can be regionally significant (e.g. to a hospital). All network utility infrastructure should be</p>	Reject the relief sought.



Submission point number	Name of submitter	Plan provision	Support or Oppose	Reason	Decision sought
				dealt with the same chapter, as 'infrastructure'.	
225.106	Royal Forest and Bird Protection Society	INF-05	Oppose	The submitter wants the infrastructure chapter specific to Regionally Significant Infrastructure. This is inappropriate as distribution networks need to be everywhere that a customer chooses to locate. Even a single connection can be regionally significant (e.g. to a hospital). All network utility infrastructure should be dealt with the same, as 'infrastructure'.	Reject the relief sought.
225.108	Royal Forest and Bird Protection Society	INF-P2	Oppose	The submitter seeks the deletion of 'other infrastructure'. The submission seeks to split up the infrastructure chapter into 'Regionally Significant Infrastructure' and 'infrastructure'. Distribution networks need to be everywhere that a customer chooses to locate. Even a single connection can be regionally significant (e.g. to a hospital). All network utility	Reject the relief sought.



Submission point number	Name of submitter	Plan provision	Support or Oppose	Reason	Decision sought
				infrastructure should be dealt the same, as 'infrastructure'. Having separate chapters for 'Regionally Significant Infrastructure' and 'infrastructure' is therefore not supported.	
225.109	Royal Forest and Bird Protection Society	INF-P3	Oppose	An enabling infrastructure policy for planned future growth is required. No future growth can occur without provision of safe, efficient, integrated, accessible and available infrastructure.	Reject the relief sought.
225.110	Royal Forest and Bird Protection Society	INF-P4	Oppose	The submitter wants the infrastructure chapter specific to Regionally Significant Infrastructure. This is inappropriate as distribution networks need to be everywhere that a customer chooses to locate. Even a single connection can be regionally significant (e.g. to a hospital). All network utility infrastructure should be dealt with the same, as 'infrastructure'.	Reject the relief sought.

Submission point number	Name of submitter	Plan provision	Support or Oppose	Reason	Decision sought
				Having separate chapters for 'Regionally Significant Infrastructure' and 'infrastructure' is therefore not supported.	
225.113	Royal Forest and Bird Protection Society	INF-P8	Oppose	The submitter wants the infrastructure chapter specific to Regionally Significant Infrastructure. This is inappropriate as distribution networks need to be everywhere that a customer chooses to locate. Even a single connection can be regionally significant (e.g. to a hospital). All network utility infrastructure should be dealt with the same, as 'infrastructure'. Having separate chapters for 'Regionally Significant Infrastructure' and 'infrastructure' is therefore not supported. The changes sought in INF-P1A and 7 are also not supported – the use of terms such as 'protected' and 'avoid' can be problematic for lineal network utilities which often pass	Reject the relief sought.



Submission point number	Name of submitter	Plan provision	Support or Oppose	Reason	Decision sought
				through a variety of different environments	
225.114	Royal Forest and Bird Protection Society	INF-P9	Oppose	The submitter wants Policy 9 to be deleted, however recognising operational and functional needs of infrastructure is an important aspect of decision making – as lineal infrastructure can often pass through a variety of different environments. It is important that the matters are appropriately considered.	Reject the relief sought.
225.119	Royal Forest and Bird Protection Society	INF-P17	Oppose	Network utility infrastructure is located wherever a customer chooses to locate. At times, network utility infrastructure needs to be located within or traverse through areas subject to overlays (including on or within heritage items, heritage settings and historic heritage sites, or sites or areas of significance to Maori), contaminated land and hazards. At times historic heritage houses will	Reject the relief sought.



Submission point number	Name of submitter	Plan provision	Support or Oppose	Reason	Decision sought
				need to connect to distribution networks (electricity or gas), and therefore provisions should not be too onerous to the owner or network provider for essential service connections.	
225.121	Royal Forest and Bird Protection Society	INF-P19	Oppose	Trees (especially within road reserve) adversely impact network utilities operation, maintenance and upgrading, and installation. An enabling infrastructure policy is required for network utility operators so efficient, effective and resilient infrastructure can be installed when required, and maintained and upgraded.	Reject the relief sought.
225.122	Royal Forest and Bird Protection Society	INF-P20	Oppose	The submitter wants the infrastructure chapter specific to Regionally Significant Infrastructure. This is inappropriate as distribution networks need to be everywhere that a customer chooses to locate. Even a	Reject the relief sought.



Submission point number	Name of submitter	Plan provision	Support or Oppose	Reason	Decision sought
				<p>single connection can be regionally significant (e.g. to a hospital). All network utility infrastructure should be dealt with the same, as 'infrastructure'. Having separate chapters for 'Regionally Significant Infrastructure' and 'infrastructure' is therefore not supported.</p> <p>At times infrastructure will be required to be located within or traverse through overlays, such as SNAs, to connect customers. Accordingly, policy 20 should be retained as drafted.</p>	
225.123	Royal Forest and Bird Protection Society	INF-P21	Oppose	<p>The submitter wants the infrastructure chapter specific to Regionally Significant Infrastructure. This is inappropriate. The submission seeks to split up the infrastructure chapter into 'Regionally Significant Infrastructure' and 'infrastructure'. Distribution networks need to be</p>	Reject the relief sought.



Submission point number	Name of submitter	Plan provision	Support or Oppose	Reason	Decision sought
				<p>everywhere that a customer chooses to locate. Even a single connection can be regionally significant (e.g. to a hospital). All network utility infrastructure should be dealt the same, as 'infrastructure'. Having separate chapters for 'Regionally Significant Infrastructure' and 'infrastructure' is therefore not supported.</p>	
225.124	Royal Forest and Bird Protection Society	INF-P22	Oppose	<p>The submitter wants the infrastructure chapter specific to Regionally Significant Infrastructure. This is inappropriate as distribution networks need to be everywhere that a customer chooses to locate. Even a single connection can be regionally significant (e.g. to a hospital). All network utility infrastructure should be dealt with the same, as 'infrastructure'. Having separate chapters for 'Regionally Significant Infrastructure'</p>	Reject the relief sought.



Submission point number	Name of submitter	Plan provision	Support or Oppose	Reason	Decision sought
				<p>and 'infrastructure' is therefore not supported.</p> <p>At times infrastructure will be required to be located within or traverse through overlays, such as outstanding natural features and landscapes, to connect customers. Accordingly, policy 22 should be retained as drafted.</p>	
225.125	Royal Forest and Bird Protection Society	INF-P23	Oppose	<p>The submitter wants the infrastructure chapter specific to Regionally Significant Infrastructure. This is inappropriate as distribution networks need to be everywhere that a customer chooses to locate. Even a single connection can be regionally significant (e.g. to a hospital). All network utility infrastructure should be dealt with the same, as 'infrastructure'. Having separate chapters for 'Regionally Significant Infrastructure'</p>	Reject the relief sought.





Submission point number	Name of submitter	Plan provision	Support or Oppose	Reason	Decision sought
				<p>and 'infrastructure' is therefore not supported.</p> <p>At times infrastructure will be required to be located within or traverse through overlays, such as the natural hazard overlays. Accordingly, policy 23 should be retained as drafted.</p>	
225.126	Royal Forest and Bird Protection Society	INF-P26	Oppose	The submitter wants this signage policy specific to Regionally Significant Infrastructure. This is inappropriate as all infrastructure providers should be able to utilise appropriate signage when required for construction, operation, maintenance and repair, or upgrading of infrastructure.	Reject the relief sought.
225.127	Royal Forest and Bird Protection Society	General	Oppose	It is appropriate that the introduction of the Infrastructure Chapter is retained to ensure clarity of the relationship of the infrastructure chapter to other chapters, and by provision of relevant objectives, policies and methods	Reject the relief sought.



Submission point number	Name of submitter	Plan provision	Support or Oppose	Reason	Decision sought
				relating to infrastructure in one section of the proposed district plan.	
225.128	Royal Forest and Bird Protection Society	INF-R3	Oppose	<p>This rule should not be specific to Regionally Significant Infrastructure, but be retained to be applicable to all infrastructure.</p> <p>It is not appropriate for the submitter to seek a 15m setback from wetlands when the NES for Freshwater Management has a 10m setback. Similarly, it is not appropriate that activities within the wetland or setback are a non-complying activity when the NES for Freshwater Management provides this as a discretionary activity.</p>	Reject the relief sought.
225.129	Royal Forest and Bird Protection Society	INF-R4	Oppose	<p>This rule should not be specific to Regionally Significant Infrastructure, but be retained to be applicable to all infrastructure.</p> <p>It is not appropriate for the submitter to seek a 15m setback from wetlands</p>	Reject the relief sought.



Submission point number	Name of submitter	Plan provision	Support or Oppose	Reason	Decision sought
				<p>when the NES for Freshwater Management has a 10m setback. Similarly, it is not appropriate that activities within the wetland or the setback are a non-complying activity when the NES for Freshwater Management provides this as a discretionary activity.</p>	
225.130	Royal Forest and Bird Protection Society	INF-R5	Oppose	<p>This rule should not be specific to Regionally Significant Infrastructure, but be retained to be applicable to all infrastructure.</p> <p>It is not appropriate for the submitter to seek a 15m setback from wetlands when the NES for Freshwater Management has a 10m setback. Similarly, it is not appropriate that activities within the wetland or the setback are a non-complying activity when the NES for Freshwater Management provides this as a discretionary activity.</p>	Reject the relief sought.



Submission point number	Name of submitter	Plan provision	Support or Oppose	Reason	Decision sought
225.131	Royal Forest and Bird Protection Society	INF-R7	Oppose	It is not appropriate that this rule should be amended to also provide for effects on indigenous biological diversity when it is drafted to provide for Special Amenity Landscapes and Coastal High Natural Character Areas. Retain this rule as notified.	Reject the relief sought.
225.132	Royal Forest and Bird Protection Society	INF-R8	Oppose	It is not appropriate that this rule be amended to also provide for effects on indigenous biological diversity when it is drafted to provide for the Natural Hazard Overlay and the Coastal Hazard Overlay. Retain this rule as notified.	Reject the relief sought.
225.139	Royal Forest and Bird Protection Society	INF-R39	Oppose	The submitter seeks discretionary activity status for upgrading of infrastructure excluding roads and walkways, cycleways and shared paths, located in an area identified as a Significant Natural Area. The requirement for an ecological assessment provided by a qualified	Reject the relief sought.



Submission point number	Name of submitter	Plan provision	Support or Oppose	Reason	Decision sought
				and experienced ecologist identifying the biodiversity values and potential impacts from the proposal is satisfactory to retain a restricted discretionary activity status.	
225.141	Royal Forest and Bird Protection Society	INF-R43	Oppose	The rule is intended to apply to infrastructure that hasn't been provided for in another rule elsewhere. The submitter seeks non-complying activity status for infrastructure including any ancillary access tracks in a Significant Natural Area which is inappropriate. The requirement for an ecological assessment provided by a qualified and experienced ecologist identifying the biodiversity values and potential impacts from the proposal is satisfactory to retain a discretionary activity status.	Reject the relief sought.

