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11 May 2021

Porirua City Council
PO Box 50218
Porirua 5240

Dear Chief Executive,

Further Submission – Proposed Porirua District Plan

Firstgas Ltd (“**Firstgas**”) lodged a submission on the Proposed Porirua District Plan (“**Proposed Plan**”) – Submitter Number 084. Broadly speaking, First Gas’s submission sought to:

- Enable the operation, maintenance, upgrade and development of its assets and operations; and
- Protect its assets and operations from others’ land use activities.

The above key submission points form the scope under which this further submission is made by Firstgas. Firstgas supports or opposes the submissions listed in **Schedule 1** (attached) of this further submission for the reasons stated in the table.

As owner, operator and / or manager of the high-pressure gas transmission network in the District, Firstgas has an interest in the Proposed Plan that is greater than the interest that the general public has.

Firstgas wishes to be heard in support of its further submission.

If others make a similar submission, Firstgas will consider presenting a joint case with them at a hearing.

Yours sincerely

A handwritten signature in blue ink that reads "Natalie Webb".

Natalie Webb
Planner

on behalf of

Wood Beca Limited

Phone Number: +6467589315
Email: Natalie.Webb@beca.com

Copy

Nicola Hine, Firstgas Ltd

Schedule 1: First Gas – Further Submission

Plan Provision/ Reference	Submitter ID and Submitter	Support / Oppose	Provision and Reason for Support or Opposition	Decision Sought
Part 1: Introduction and General Provisions				
Definition of Functional Need	83.3 Powerco Ltd	Support	Firstgas supports the submission which seeks to retain the definition of 'Functional Need' as notified.	Allow
	60.5 Transpower New Zealand	Support	Firstgas supports the submission which seeks to retain the definition of 'Functional Need'.	Allow
Definition of Gas Transmission Network	81.70 Kainga Ora – Homes and Communities	Support	Firstgas supports the submission which seeks to retain the definition of 'Gas Transmission Network'.	Allow
Definition of Gas Transmission Pipeline Corridor	81.71 Kainga Ora - Homes and Communities	Support	Firstgas supports the submission which seeks to retain the definition of 'Gas Transmission Pipeline Corridor'.	Allow
	130.1 Geoffrey Jorgensen	Oppose	<p>Firstgas does not support this submission which seeks to amend the definition so that the proposed corridor zone is consistent with the six meter zone as outlined in the Firstgas' Notice of Requirement.</p> <p>Firstgas is seeking to retain the definition of 'Gas Transmission Pipeline Corridor' which means the area of land within 10m from the centreline of the gas transmission pipeline. The additional 4m buffer over and above 6m sought in its' Notice of Requirement is required to ensure that reverse sensitivity effects can be effectively and efficiently be managed, inclusive of access to the network.</p>	Disallow
Definition: Maintenance and Repair	83.5 Powerco Ltd	Support	Firstgas supports this submission which seeks to retain the definition of 'Maintenance and Repair' as notified.	Allow
	60.8 Transpower New Zealand	Support	Firstgas supports this submission which seeks to retain the definition of 'Maintenance and Repair' as notified.	Allow
Definition of Network Utility Operator	83.7 Powerco Ltd	Support	Firstgas supports this submission which seeks to retain the definition of 'Operational Need' as notified.	Allow
Definition of Operational Need	83.8 Powerco Ltd	Support	Firstgas supports this submission which seeks to retain the definition of 'Operational Need' as notified.	Allow

Sensitivity: General

Plan Provision/ Reference	Submitter ID and Submitter	Support / Oppose	Provision and Reason for Support or Opposition	Decision Sought
	60.12 Transpower New Zealand	Support	Firstgas supports this submission which seeks to retain the definition of 'Operational Need' as notified.	Allow
Definition of Upgrading	83.13 Powerco Limited	Support	Firstgas supports the following amendment to the definition of 'Upgrading' to provide more clarity to the definition: As it applies to infrastructure, means the improvement, <u>relocation, replacement</u> , or increase in carrying capacity, operational efficiency, <u>size, pressure</u> , security, or safety of existing infrastructure, but excludes maintenance and repair.	Allow
Part 2: District-Wide Matters				
Resilience, Efficiency and Energy				
REE-03	83.21 Powerco Limited	Support	Firstgas supports this submission which seeks to retain Objective REE-03 as notified which will ensure that subdivision, use and development does not increase risks to people, property, and infrastructure.	Allow
Energy, Infrastructure and Transport				
INF-03	52.9 Hamish Tunley	Oppose	Firstgas does not support this submission which is seeking further review of Policy INF-03 so that it is more specific. The submission seeks to reduce the proposed Gas Transmission Pipeline Corridor to be in line with the 12m Gas Easement / Designation. As above, Firstgas is seeking to retain the definition of 'Gas Transmission Pipeline Corridor' which means the area of land within 10m from the centreline of the gas transmission pipeline. The additional 4m buffer over and above 6m sought in its' Notice of Requirement is required to ensure that reverse sensitivity effects can be effectively and efficiently be managed, inclusive of access to the network.	Disallow
INF-05	83.27 Powerco Limited	Support	Firstgas supports this submission which seeks to retain Objective INF-05 which recognises the benefits and importance of infrastructure.	Allow
	60.33 Transpower New Zealand	Support	Firstgas supports this submission which seeks to retain Objective INF-05 on the basis it: <ul style="list-style-type: none"> Provides for the benefits; Recognises the operation, maintenance, upgrade and development, while Avoiding, remedying or mitigating adverse effects. 	Allow

Sensitivity: General

Plan Provision/ Reference	Submitter ID and Submitter	Support / Oppose	Provision and Reason for Support or Opposition	Decision Sought
INF-P2	83.29 Powerco Limited	Support	Firstgas supports this submission which seeks to retain Policy INF-P2 which recognises the benefits and importance of infrastructure.	Allow
INF-P5	52.7 Hamish Tunley	Oppose	<p>Firstgas does not support this submission which seeks that the distance of the Gas Transmission Pipeline Corridor definition should be reduced from the proposed 20m in width to be consistent with the First Gas Designation of 12m in width.</p> <p>Firstgas is seeking to retain the definition of 'Gas Transmission Pipeline Corridor' which means the area of land within 10m from the centreline of the gas transmission pipeline. The additional 4m buffer over and above 6m sought in its' Notice of Requirement is required to ensure that reverse sensitivity effects can be effectively and efficiently be managed, inclusive of access to the network.</p>	Disallow
INF-P5	81.251 Kainga Ora - Homes and Communities	Oppose	<p>Kainga Ora is seeking that Policy INF-P5 is deleted and it does not support the term "avoid" with a corresponding non-complying rule framework. This submission point states the designation corridors by Requiring Authorities should be utilised where such a degree of protection is required.</p> <p>Firstgas opposes this submission and seeks for Policy INF-P5 to be retained as notified. As outlined in the original submission, Firstgas' assets are to be designated. Irrespective of this, reverse sensitivity effects beyond any designated corridor need to be managed, inclusive of access.</p>	Disallow
INF-P22	83.44 Powerco Limited	Support	Firstgas supports this submission which seeks to retain Policy INF-P22 as notified which recognises 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.	Allow
INF-P25	81.271 Kainga Ora - Homes and Communities	Oppose	<p>Kainga Ora is seeking that Policy INF-P25 is deleted as the Gas Transmission Pipeline Corridor is designated for, so works can be undertaken by the Requiring Authority using its designation. Beyond this, relevant chapters have provisions relating to the Gas Transmission Pipeline Corridor to manage reverse sensitivity effects, and therefore this provision appears redundant.</p> <p>As above, Firstgas opposes this submission and seeks for Policy INF-P5 to be retained as notified. As outlined in the original submission, Firstgas' assets are to be designated. Irrespective of this, reverse sensitivity effects beyond any designated corridor need to be managed, inclusive of access.</p>	Disallow

Sensitivity: General

Plan Provision/ Reference	Submitter ID and Submitter	Support / Oppose	Provision and Reason for Support or Opposition	Decision Sought
INF-P25	52.8 Hamish Tunley	Oppose	<p>Firstgas does not support this submission which seeks that the distance of the Gas Transmission Pipeline Corridor definition should be reduced from the proposed 20m in width to be consistent with the First Gas Designation of 12m in width.</p> <p>Firstgas is seeking to retain the definition of 'Gas Transmission Pipeline Corridor' which means the area of land within 10m from the centreline of the gas transmission pipeline. The additional 4m buffer over and above 6m sought in its' Notice of Requirement is required to ensure that reverse sensitivity effects can be effectively and efficiently be managed, inclusive of access to the network.</p>	Disallow
INF-P25	34.1 Catriona O'Meara-Hunt	Oppose	<p>Firstgas does not support this submission which seeks to not approve the extension of the current allocated provision of 6m either side of the Gas Transmission Pipeline Corridor to the proposed 10m either side.</p> <p>Firstgas is seeking to retain the definition of 'Gas Transmission Pipeline Corridor' which means the area of land within 10m from the centreline of the gas transmission pipeline. The additional 4m buffer over and above 6m sought in its' Notice of Requirement is required to ensure that reverse sensitivity effects can be effectively and efficiently be managed, inclusive of access to the network.</p>	Disallow
INF-P25	11.7 Porirua City Council	Support	<p>Firstgas supports this submission which seeks to amend Policy INF-P25 as follows:</p> <p>Consider the following matters when assessing any buildings, structures and activities proposed within, and <u>habitable buildings near</u>, the Gas Transmission Pipeline Corridor:</p> <p>This provides clarification that the policy is inclusive of habitable buildings.</p>	Allow
INF-R3	83.49 Powerco Limited	Support	<p>Firstgas supports this submission which seeks to retain Rule INF-R3 as notified which provides for the repair and maintenance of existing infrastructure outside of any Overlay.</p>	Allow
INF-R5	83.51 Powerco Limited	Support	<p>Firstgas supports this submission which seeks to retain Rule INF-R5 as notified which provides for the maintenance and repair and removal of existing infrastructure within any Overlay.</p>	Allow
INF-R6	83.52 Powerco Limited	Support	<p>Firstgas supports this submission which seeks the following amendment to Rule INF-R6 so that there is provision to replace and upgrade the gas pipeline:</p> <p>1. Activity status: Permitted</p> <p>Where:</p>	Allow

Sensitivity: General

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			<p>a. The infrastructure is an antenna; and</p> <p>b. the infrastructure is a gas line, regulator, meter, valve or meter cover; and</p> <p>c. Compliance is achieved with INF – S2</p>	
INF-R39	83.62 Powerco Limited	Support	Firstgas supports this submission which seeks to amend Rule INF-R39 so that upgrades that have no or very little impact on Significant Natural Areas are provided for as a Permitted Activity.	Allow
INF-S14	83.72 Powerco Limited	Support	<p>Firstgas supports this submission which seeks to amend Standard INF-S14 to exempt holes drilled by an auger and both underground and above ground infrastructure as follows:</p> <p>3. Earthworks must not be located within 1.0m of the site boundary, measured on a horizontal plane except:</p> <p>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</p> <p>b. Where the site boundary separates adjoining sites which are both within the area of land subject to the proposed works.</p>	Allow
Subdivision				
SUB-P11	60.85 Transpower New Zealand	Support	Firstgas supports this submission which seeks to retain Policy SUB-P11 which provides for the creation of allotments for the purposes of infrastructure.	Allow
SUB – R16	42.3 Bill McGavin	Oppose	<p>Firstgas does not support this submission which opposes the width of the Gas Transmission Pipeline Corridor.</p> <p>The width of the Gas Transmission Pipeline Corridor is required to ensure that reverse sensitivity effects can be effectively and efficiently be managed, inclusive of access to the network.</p>	Disallow

Sensitivity: General

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Earthworks				
EW - 01	82.164 Waka Kotahi NZ Transport Agency	Support in part	<p>Firstgas supports this submission in part which seeks the following amendment to Objective EW-01.</p> <p>Earthworks are undertaken in a manner that:</p> <p>4. Protects the safety of people, and property; <u>and infrastructure: and</u></p> <p>5. Minimises Mitigates adverse effects on the National Grid and the Gas Transmission Pipeline infrastructure.</p> <p><u>Firstgas supports the proposed amendment to include the term 'mitigate' however, is not supportive of the proposed amendment to refer to all infrastructure only. Firstgas seek this is amended to the following:</u></p> <p>5. Minimises Mitigates adverse effects on all infrastructure and in particular the Gas Transmission Pipeline <u>infrastructure.</u></p>	Allow
EW – P4	81.486 Kainga Ora – Homes and Communities	Oppose	<p>Firstgas does not support this submission which seeks to delete the following Policy:</p> <p>Enable earthworks within the National Grid Yard and the Gas Transmission Pipeline Corridor where they are of a scale and nature that will not compromise the safe and efficient functioning, operation, maintenance and repair, upgrading and development of the National Grid or the Gas Transmission Network.</p> <p>Firstgas is seeking that this policy is retained as notified.</p>	Disallow
EW – P5	60.94 Transpower New Zealand Ltd	Support	<p>Firstgas support this submission which seeks to amend Policy EW – P5 so that there is differing policy directive provided for the National Grid from that of the Gas Transmission Pipeline by separating the two activities.</p>	Allow
Part 3: Area Specific Matters				
General Residential Zone				
GRZ – R23	52.11 Hamish Tunley	Oppose	<p>Firstgas does not support this submission which is seeking to amend Rule GRZ – R23 so the following rule trigger is removed:</p>	Disallow

Sensitivity: General

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			<p>Any habitable building or structure is located within 10m of the Gas Transmission Pipeline Corridor.</p> <p>The submission is seeking this amendment as it does not align with the Firstgas Designation. Firstgas does not support this as the additional 4m buffer over and above 6m sought in its' Notice of Requirement is required to ensure that reverse sensitivity effects can be effectively and efficiently be managed, inclusive of access to the network.</p>	
GRZ – R23	25.1 Michael Wood	Oppose	<p>Firstgas does not support this submission which is seeking that Rule GRZ – R23 aligns with the Firstgas easement.</p> <p>The requirement for a resource consent for any habitable building or structure which is located within 10m of the Gas Transmission Pipeline Corridor is required to ensure that reverse sensitivity effects can be effectively and efficiently be managed, inclusive of access to the network.</p>	Disallow
Designation				
Conditions for FGL-01	42.1 Bill McGavin	Oppose	<p>This submission is seeking that Firstgas consult with any landowners as to when, how and where access is required to repair or maintain their pipeline on landowner's property. Any damages to property in gaining access (to and from the property) will be put right at no cost,</p> <p>This is not a Resource Management Act matter and should be dealt with separately through Firstgas and the landowner.</p>	Disallow
Conditions for FGL-01 – Maintenance	11.70 Porirua City Council	Support	<p>Firstgas supports this submission which seeks that the following condition should be removed as the RMA has an Outline Plan waiver process:</p> <p>Condition 1 Maintenance Firstgas shall be exempt from providing an Outline Plan of Works for ongoing maintenance works (including the repair and replacement of existing assets) enabled by this designation.</p>	Allow