



Wellington Electricity Lines Limited
NOTIFIED PORIRUA DISTRICT PLAN

To Porirua City Council

Sent via email to: dpreview@pcc.govt.nz

FROM: Wellington Electricity Lines Limited
("WELL") PO Box 31049
Lower Hutt 5040

Date 20 November 2020



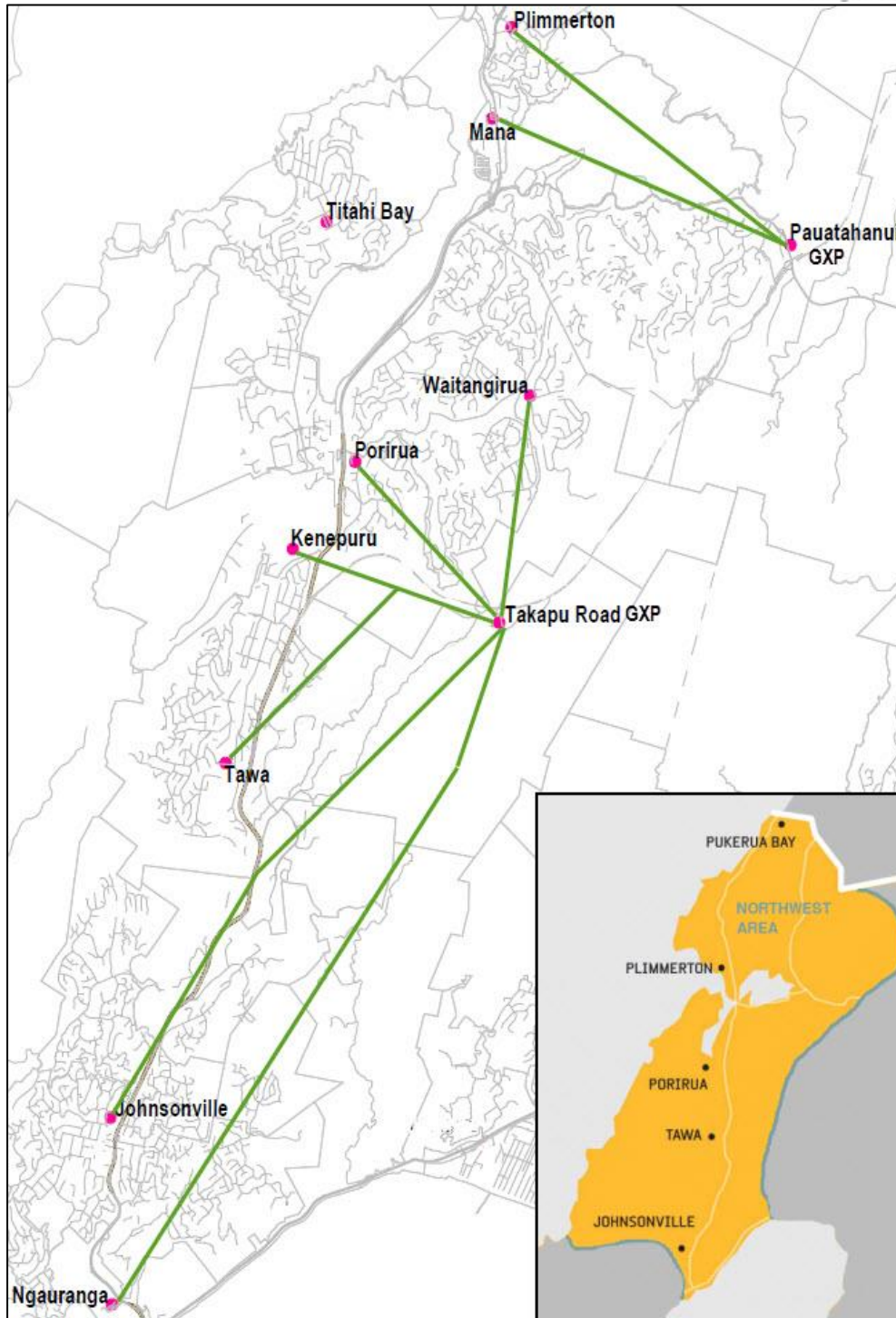
1.0 Introduction

- 1.1 Wellington Electricity Lines Limited ('WELL') appreciates the opportunity to provide comments in regard to the Porirua City Council (PCC) Notified Proposed District Plan.
- 1.2 The district plan review process has been undertaken in stages, with this stage (*Notified District Plan*) being the final consultation phase that will assist directing PCC's next District Plan iteration.
- 1.3 By way of some background, WELL submitted on the initial rounds of the District Plan consultation from as far back as 2015, as well as the *Make Your Mark* consultation documents in 2017 and 2018.
- 1.4 In providing this feedback – key themes previously provided by WELL have been revisited in consideration of the Notified Proposed Porirua District Plan.

2.0 Submission Context: Wellington Electricity Lines Limited

- 2.1 Wellington Electricity Lines Limited owns and operates electricity distribution network assets within the Wellington Region - inclusive of the Porirua Basin.
- 2.2 WELL is committed in its regulatory obligation to provide consumers with an effective, safe, and secure supply of electricity, which in doing so provides a critical service to customers as well as a public good to local communities and industry.
- 2.3 WELL own distribution substations, lines and cables located in public road reserve, as well as on private property and along easements.
- 2.4 WELL own and operates critical¹ high voltage lines (11kV – 33kV) across the Porirua District (see the WELL Sub Transmission image below) and has particular interest in the review of District Plan regulatory provisions that have the potential to impact the safe and efficient operation and development of such sub transmission infrastructure.
- 2.5 By providing this feedback, it is the intention that the coverage of matters, directly or indirectly, pertaining to WELL's infrastructure operation and development in the next iteration of the Porirua District Plan are at an appropriate level – and furthermore, that such coverage is enabling for security of supply of the district's electricity supply network.

¹ Critical lines are high voltage lines that supply essential public services such as the hospital, civil defence facilities or Lifeline sites; or supply large industrial or commercial electricity consumers; or supply 1000 or more consumers; or are lines that are difficult to replace with an alternative electricity supply if they are compromised.



Wellington North Western Area Sub-transmission Network (Wellington Electricity)

- 2.6 The purpose of the Proposed District Plan is to assist Porirua District Council (Council) to carry out its functions in order to achieve the purpose in Part 2 of the RMA.
- 2.7 WELL's electricity distribution infrastructure supports the sustainable management and efficient use of natural and physical resources as promoted in Part 2 of the RMA.



- 2.8 A fundamental part of enabling people and communities to provide for their social, economic and cultural wellbeing under section 5 of the RMA is the provision of a secure and efficient supply of electricity.
- 2.9 The benefits of WELL's electricity infrastructure in achieving sustainable management are also enshrined in the RMA through sections 7(b) and 7(ba); in achieving the purpose of the RMA, particular regard is to be given to "the efficient use and development of natural and physical resources" and "the efficiency of the end use of energy".

3.0 Submission: Overview

- 3.1 PCC are culminating their comprehensive District Plan review process, with Stage 4 (identified as the '*Notified District Plan*'), and are currently inviting further public consultation, and interested party feedback, on themes addressed as far back as 2015.
- 3.2 Delivery of the Notified Proposed District Plan consultation is the release of a firm set of definitions, objectives and policies which have been developed over the past five years, and which have been applied in the Notified Proposed Porirua District Plan (PDP).
- 3.3 This feedback has been prepared at a level applicable to the nature and scope of the Notified PDP. In particular, WELL's comments have been provided associating how WELL's network and business interests relate to the local regulatory settings of the PDP.
- 3.4 In consideration of this submission, WELL has provided feedback to the Ministry for the Environment in regard to the National Planning Standards (NPS). Where possible, the feedback provided in this submission will reflect that of the NPS. WELL note that Council is cognisant of the NPS - with the PDP being able to align with the intent of the applicable planning standards.
- 3.5 Notwithstanding the previous feedback provided to PCC by WELL, the comprehensive District Plan review is very important for network utility operators – such as WELL – as land use and subdivision development activities proposed throughout the Porirua District will often instigate customer driven network utility upgrading and development. Therefore, WELL's feedback is in the context of infrastructure provisions being appropriately set in the PDP.
- 3.6 WELL has reviewed the PDP – and consequently has provided specific comment in relation to the proposed objectives, policies, rules and performance standards. WELL has adopted a submission format that identifies a specific provision, indicative level of support, and makes a subsequent statement on the reasoning behind the level of support and desired outcome.
- 3.7 WELL submits that some further refinement is required to the PDP to ensure that the document is able to be effectively implemented and understood; as well as to enhance particular provisions in order to provide for the importance of electricity infrastructure (as provided in Part 2 of the RMA).



- 3.8 The reasons for these changes and the specific relief sought by WEL to address its concerns which are set out in the table below. If the specific relief (proposed wording amendments) is not accepted by Council, WELL alternatively requests that appropriate, alternative, amendments be made to the provisions to give effect to the concerns raised by WELL.
- 3.9 WELL would like to take this opportunity to acknowledge the District Plan Review Team meticulously adopting feedback from WELL in the pre-consultation stages of the PDP. It is because of Council's acceptance of a number of comments previously provided by WELL that the overall content of the PDP infrastructure provisions are well considered, robust, and more importantly reflect the appropriate context for the safe and secure supply of the District's electricity distribution network.

Signature for and on behalf of Wellington Electricity Lines Limited:

A handwritten signature in blue ink, appearing to read 'Tim Lester', written over a dotted line.

Tim Lester
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tim.lester@edison.co.nz

Address for service:

Wellington Electricity Lines Limited
c/- Edison Consulting Group Ltd

PO Box 875

Hamilton 3240

Attention: Tim Lester

- WELL could not gain an advantage in trade competition through this submission.
- WELL is not directly affected by an effect of the subject matter of the submission that:
 - (a) adversely affects the environment; and
 - (b) does not relate to trade competition or the effects of trade competition.
- WELL wish to be heard in support of their submission.
- WELL will consider presenting a joint case with other submitters, who make a similar submission, at a hearing.





SECTION OF PLAN	SPECIFIC PROVISION	SUPPORT/SUPPORT IN PART/OPOSE	REASON FOR SUBMISSION	RELIEF SOUGHT Text to add shown as <u>underlined</u> Text to delete shown as strike through
<i>Definitions</i>				
Definitions	<p>Building</p> <p><i>Means a temporary or permanent movable or immovable physical construction that is:</i></p> <p><i>partially or fully roofed; and fixed or located on or in land; but excludes any motorised vehicle or other mode of transport that could be moved under its own power.</i></p>	Oppose	<p>Power poles, support structures and mast poles are not buildings – yet based on the definition there is the potential for such structures to be inappropriately captured by the definition.</p> <p>It is acknowledged that the Building definition has been taken from the NPS; however, WELL consider that a distinction or reference to the Building Act should be provided for clarity and efficiency.</p>	Exclude power poles, support structures and mast poles from the definition of a building as per section 9(a), (ab), (ac) of the Building Act 2004.
	<p>Cabinet</p> <p><i>means a three-dimensional structure that houses radio and telecommunication equipment and electrical equipment associated with the operation of infrastructure, which includes single transformers and associated switching gear distributing electricity at a voltage up to and including 110KV.</i></p>	Support	WELL support the proposed definition for a 'Cabinet' to the extent that it explicitly includes a casing for the continued use of electrical equipment such as switchgear and transformers.	Retain the definition as currently drafted.



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	<p>Line</p> <p>...</p> <p><i>and means line as defined in section 2 of the Electricity Act 1992:</i></p> <p>a) <i>means works that are used or intended to be used for the conveyance of electricity.</i></p>	Support	WELL support this definition as it is appropriately taken from the Electricity Act 1992 – and hence is unambiguous in its meaning, and therefore its interpretation.	Retain the definition as currently drafted.
	<p>Network utility operator</p> <p><i>has the same meaning as in s166 of the RMA:</i></p> <p>...</p>	Support	WELL support this definition as it is appropriately taken from the Resource Management Act 1991 – and hence is unambiguous in its interpretation.	Retain the definition as currently drafted.
	<p>Maintenance and Repair</p> <p><i>means any work or activity necessary to continue the operation and / or functioning of existing infrastructure. It does not include upgrading.</i></p>	Support in Part	<p>Maintenance and repair of electricity distribution network equipment is often required as a result of equipment reaching its end of life – and hence will be required to be replaced.</p> <p>To ensure the effective interpretation of Maintenance and repair works for infrastructure providers WELL consider that the word '<i>replacement</i>' is included within the</p>	<i>means any work, <u>replacement</u>, or activity necessary to continue the operation and / or functioning of existing infrastructure. It does not include upgrading.</i>



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			term's definition.	
	<p>Regionally significant infrastructure</p> <p><i>means regionally significant infrastructure including:</i></p> <p>...</p> <p><i>d) facilities for the generation and/or transmission of electricity where it is supplied to the network;</i></p> <p>...</p>	Support in Part	<p>WELL's distribution network consists of lower voltage electricity supply to the local network. The distribution also contains higher-voltage transmission lines that takes electricity supply from the National Grid which is then stepped down to a lower voltage to service the local network (see image in the introduction section of this submission).</p> <p>To appropriately differentiate these two distinct elements of the distribution network, WELL seeks the word 'local' immediately precedes the word network.</p>	<p><i>d) facilities for the generation and/or transmission of electricity where it is supplied to the <u>local</u> network;</i></p>
	<p>Transmission line</p> <p><i>has the same meaning as in section 3 of the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009:</i></p> <p>...</p>	Support in part	<p>WELL acknowledge that NESETA is legislation applicable solely to that of the National Grid.</p> <p>In acknowledging this, WELL wish to raise a disconnect within the PDP whereby transmission lines that are not contained within the National Grid are specified (i.e., Infrastructure rules preamble) – and yet the definition only specifies National Grid transmission lines.</p>	<p>The PDP references Transmission Lines not defined under the NES, however, the only definition for Transmission lines is taken from the NPS.</p> <p>WELL seek that provision is made to identify transmission lines that are not a component of the National Grid – thus providing for WELL's regionally significant Sub Transmission lines.</p>
	<p>Temporary Infrastructure</p> <p><i>means infrastructure established on a temporary</i></p>	Support	<p>WELL support the definition for Temporary Infrastructure as it correctly identifies that such supplementary infrastructure is for both</p>	<p>Retain the definition as currently drafted.</p>



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	<p><i>basis intended to provide services, or supplement existing services, for a defined or undefined period of time, where:</i></p> <p><i>there is or will be a disruption to necessary services provided by existing infrastructure as a result of unforeseen circumstances or planned maintenance or upgrading; or</i></p> <p><i>the temporary infrastructure is to provide necessary services in advance of the provision of permanent infrastructure.</i></p>		<p>planned and unplanned outages.</p>	
Functioning City				
<p>FC - Functioning City</p>	<p>FC-01 Infrastructure</p> <p><i>Effective, efficient, resilient and safe infrastructure throughout the City that...</i></p>	<p>Support</p>	<p>WELL contend that FC-01 suitably addresses the desirable and functional context in which to guide infrastructure provision across Porirua City.</p> <p>Key elements of interest to WELL’s operation and development are address in the objective such as resilience, and growth management planning applicable to network capacity and</p>	<p>WELL seek that Objective FC-01 is retained as currently drafted.</p>



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			upgrading.	
	<p>FC-03</p> <p>Existing activities</p> <p><i>The ongoing operation, character and amenity values of existing lawful activities are protected from incompatible activities.</i></p>	Support	WELL support this high-level objective as it appropriately recognises risk to the operation of infrastructure (such as WELL’s electricity distribution network and facilities) against the adverse effect associated with reverse sensitivity (particularly in regard to urban growth pressures.	WELL seek that Objective FC-03 is retained as currently drafted.
Urban Form and Development				
	<p>UFD-04</p> <p>Future urban areas</p> <p><i>Future urban growth areas are able to be serviced by infrastructure that has sufficient capacity to accommodate the form and type of development anticipated.</i></p>	Support in Part	<p>WELL generally support the intent behind UFD-04; however, it is considered that the wording be slightly amended so as to ensure that growth areas can be provisioned with the appropriate infrastructure prior to physical development.</p> <p>As currently worded, the Objective is not explicit in that urban growth is to be serviced by infrastructure – as opposed to the more loosely defined ‘able’ to be serviced.</p> <p>Almost all urban growth will be able to be serviced by infrastructure at some point in time. To ensure that infrastructure is in place (i.e., appropriately planned for or established) the word ‘able’ should be removed from the</p>	<i>Future urban growth areas are able to be serviced by infrastructure that has sufficient capacity to accommodate the form and type of development anticipated.</i>



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			objective.	
	<p>UFD-05</p> <p>Subdivision, use and development</p> <p><i>Subdivision, use and development is integrated with the transport network, and supports Porirua’s current and future needs.</i></p>	Support in Part	<p>WELL acknowledge that Porirua’s growing population is driving increased demand for subdivision.</p> <p>Such growth will need to be adequately provided for in the PDP.</p> <p>As noted by Council, subdivision generates further demand for infrastructure services, particularly three waters and transport services; however, network utility infrastructure similarly experiences demand from such growth.</p> <p>As currently drafted Objective UFD-05 provides a framework setting for ensuring that subdivision and changes in land use are adequately serviced by transportation infrastructure.</p> <p>WELL consider that it is appropriate for Objective UFD-05 to also reference network Utility Infrastructure – and not just focus on transportation.</p>	<p><i>Subdivision, use and development is integrated with the <u>network utility</u> and transport networks, and supports Porirua’s current and future needs.</i></p>
Infrastructure				
INF - Infrastructure	Introduction- Preamble	Support in Part	WELL consider it important that key messages are presented clearly and consistently in the	<i>While infrastructure is often seen as a necessary and normal part of urban and</i>



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	<p>“... <i>While infrastructure is often seen as a necessary and normal part of urban and rural environments, ...”</i></p>		<p>PDP. In this regard, WELL consider that comments relating to infrastructure provision are presented fairly and reasonably in the preamble to the INF – Infrastructure section of the PDP.</p> <p>Consequently, WELL seek the removal of the word ‘often’ from the preamble as Infrastructure is unavoidable in urban and rural environments. The word ‘often’ is redundant and should consequently be removed.</p>	<p><i>rural environments, it can also have adverse effects on surrounding land uses and the environment, ...</i></p>
	<p>INF-03 Availability of infrastructure to meet existing and planned needs</p> <p><i>Safe, efficient, and resilient infrastructure is available to meet the needs of, and is well integrated with, existing and planned subdivision, use and development.</i></p>	<p>Support in Part</p>	<p>WELL agree in principle with the Objective INF-03 wording; however, it is considered appropriate that some minor wording changes are undertaken so as to more clearly explain when such infrastructure is to be available.</p> <p>WELL consider it appropriate to include the words ‘in advance’ (or similar) after the word available so as to clearly communicate the expectation that the provision of infrastructure is planned for in advance of growth – rather than be provided for as a consequence of subdivision use and development.</p>	<p><i>Safe, efficient, and resilient infrastructure is available <u>in advance</u> to meet the needs of, and is well integrated with, existing and planned subdivision, use and development.</i></p>
	<p>INF-P1 The benefits of Regionally Significant Infrastructure</p>	<p>Support</p>	<p>WELL support the wording used for Policy INF-P1 as it clearly acknowledges WELL’s electricity transmission function as it supplies the local network.</p>	<p>WELL seek that INF-P1(1) is retained as is currently drafted.</p>



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	<p><i>Recognise the social, economic, environmental and cultural benefits of Regionally Significant Infrastructure, including:</i></p> <ol style="list-style-type: none"> <i>1. The safe, secure and efficient transmission and distribution of gas and electricity that gives people access to energy to meet their needs;</i> <p>...</p>		<p>In consideration of the wording contained within INF-P1 - WELL reiterates the amendments sought to the definition of Regionally Significant Infrastructure – this being to clarify that the Sub Transmission network (being Regionally Significant) provides critical high-voltage supply to the local network where such voltage is stepped down for use by WELL’s customers.</p>	
	<p>INF-P2</p> <p><i>The benefits of infrastructure other than Regionally Significant Infrastructure</i></p> <p><i>Recognise the benefits that infrastructure not defined as Regionally Significant Infrastructure provides to the economic, social and cultural functioning of the City and health and wellbeing of people and communities.</i></p>	<p>Support in Part</p>	<p>WELL is an infrastructure provider that contains operational elements defined as Regionally Significant Infrastructure (i.e., the sub-transmission network indicated in the image in this submission’s introduction), as well as elements that do not fall under the definition of Regionally Significant Infrastructure (i.e., local distribution networks commonly associated with street-level poles and distribution cabinets).</p> <p>In regard to the local-level distribution network, WELL support the intent behind proposed policy INF-P2 as it will ensure that development is managed around infrastructure</p>	<p>WELL seek that Policy INF-P2 is retained except to the extent indicated as follows:</p> <p><i>Recognise the benefits that infrastructure not defined as Regionally Significant Infrastructure provides to the economic, social, <u>resilient</u>, and cultural functioning of the City and health and wellbeing of people and communities</i></p>



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			<p>to avoid any potential reverse sensitivity effects, as well as to direct rules and development standards that are enabling to the development and operation of the local electricity distribution network.</p> <p>WELL consider that it is appropriate to reflect that the electricity distribution network is also a Lifeline Utility (as defined under the Civil Defence Emergency Management Act 2002); consequently, the minor amendment as indicated is sought.</p>	
	<p>INF-P3</p> <p>Infrastructure for planned future growth</p> <p><i>Enable infrastructure to be provided in a manner that is safe, efficient, integrated, accessible and available to provide sufficient capacity for existing and planned subdivision, use and development.</i></p>	<p>Support</p>	<p>WELL place an elevated emphasis on a considered and strategically planned expansion to the electricity network capacity, and associated upgrades, so as to meet both current and projected population growth.</p> <p>In this regard it is important that the PDP contain suitably worded infrastructure provisions such that infrastructure is planned for (if not already provided), in advance of urban growth.</p> <p>Policy INF-P3 provides an appropriate level of Council direction as to the importance to proactively enable infrastructure provision in consideration of growth management – particularly in regard to the reference of “existing and planned subdivision, use and</p>	<p>WELL seek that Policy INF-P3 is retained as currently drafted.</p>



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			development”.	
	<p>INF-P5</p> <p>Adverse effects on Regionally Significant Infrastructure</p> <p><i>Protect the safe and efficient operation, maintenance and repair, upgrading, removal and development of Regionally Significant Infrastructure from being unreasonably compromised by:</i></p> <p>....</p>	Support	<p>WELL’s sub transmission infrastructure provides a critical supply of electricity across the Wellington Region and hence is Regionally Significant Infrastructure (see image above of WELL’s <i>Wellington North Western Area Sub-transmission Network</i>).</p> <p>Policy INF-P5 provides an appropriate level of security in regard to mitigating the actual and potential adverse effects on such RSI.</p> <p>WELL is pleased to see specific reference to the effects subdivision may have on RSI – particularly the effect of access to the section of RSI being impeded through subdivision design.</p>	WELL seek that Policy INF-P5 is retained as currently drafted.
	<p>INF-P9</p> <p>Recognise operational needs and functional needs of infrastructure</p> <p><i>Recognise the operational needs and functional needs of Regionally Significant Infrastructure and other infrastructure by having regard to the following</i></p>	Support	<p>WELL support this policy as both Sub Transmission and Local Network components of the electricity distribution network have been acknowledged.</p> <p>WELL interpret Policy INF-P9 as addressing operational needs as it applies to existing infrastructure, whilst functional need being that associated with the design of new infrastructure.</p> <p>As the electricity distribution network</p>	WELL seek that Policy INF-P9 is retained as currently worded.



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	<p><i>matters when making decisions on new infrastructure and the maintenance and repair and upgrading of existing infrastructure:...</i></p>		<p>represents linear infrastructure (as does most other infrastructure), the functional need for the design (line route) of a new section of line often has a functional need to be located through more sensitive environments.</p> <p>The policy direction provided by INF-P9 provides an appropriate level of guidance in regard to assessment weighting when considering the functional need for the infrastructure (or a section of such infrastructure) being located within otherwise sensitive environments.</p>	
	<p>INF-P18</p> <p><i>Trimming, pruning and activities within the root protection area of notable trees</i></p> <p><i>Enable the trimming, pruning and activities within the root protection area of a tree identified in SCHED5 - Notable Trees for the purpose of operating, maintaining and repairing, upgrading and removing existing infrastructure and any new</i></p>	<p>Support in Part</p>	<p>WELL support the policy setting provided in the PDP in regard to existing and new network infrastructure being operated or developed within close proximity to otherwise protected vegetation.</p> <p>WELL and their network contractors are specialists in vegetation management and as such possess suitable expertise in operating and maintaining electricity lines within close proximity to vegetation.</p> <p>WELL operate a significant network of underground lines across the district; however, more established urban areas contain sections of their overhead line network.</p>	<p>WELL seek that the following amendment to INF-P18 is made so as to ensure the policy also recognises the districts overhead line network:</p> <p><i>“Enable the trimming, pruning and activities within the root protection <u>and dripline areas</u> of a tree identified in SCHED5 - Notable Trees for the purpose of operating, maintaining and repairing, upgrading and ...”</i></p>



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	<p><i>infrastructure where:</i></p> <p>...</p>		<p>WELL consider that a minor amendment is made to Policy INF-P18 so as to recognise sections of WELL’s overhead line network.</p> <p>WELL supports the policy providing explicit reference to the <i>Electricity (Hazards from Trees) Regulations 2003</i>. Such reference to the applicable legislation provides a clear and unambiguous message to users of the PDP.</p>	
	<p>INF-P19</p> <p>Removal of Notable trees</p> <p><i>Only allow the removal of a tree identified in SCHED5 - Notable Trees for the purpose of operating, maintaining and repairing, upgrading and removing existing infrastructure and any new infrastructure where it can be demonstrated that:</i></p> <ol style="list-style-type: none"> <i>There is an operational need or functional need that means the infrastructure's location cannot be avoided; and</i> 	<p>Support</p>	<p>WELL support the policy direction in INF-P19 as it appropriately recognises that tree removal is unavoidable in some instances.</p> <p>WELL agree that the protection of notable trees is an important consideration across the district; however, the policy direction proposed enables technical and operational considerations whereby the removal of such trees can be undertaken if there is no feasible alternative.</p>	<p>WELL seek that Policy INF-P19 is retained as currently drafted.</p>



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	<i>There are no feasible alternatives.</i>			
	<p>INF-P24</p> <p>The National Grid Pāuatahanui Substation Yard</p> <p><i>Consider the following matters when assessing any buildings, structures and activities proposed within the National Grid Pāuatahanui Substation Yard:</i></p> <p>1. <i>Where located in the Settlement Zone:</i></p> <p>a) ...</p> <p>b) <i>The extent to which the proposed development will avoid the potential reverse sensitivity effects on and amenity and nuisance effects of the National Grid Pāuatahanui Substation.</i></p> <p>....</p>	Support in Part	<p>WELL supply Porirua City and surrounds with a safe and secure electricity service through the Pāuatahanui Substation Grid Exit Point (see image above of WELL’s Wellington North Western Area Sub-transmission Network).</p> <p>In consideration of this significant and strategic component of the district’s electricity supply network, WELL consider it important to submit on INF-P24, particularly because of WELL’s assets contained within, or in close proximity to the Pāuatahanui Substation Yard (i.e., two feeders to the Plimmerton Area).</p> <p>WELL appreciate that the purpose of INF-P24 is to provide specific protection to the Transpower Substation that is not otherwise subject to NESETA – however, given the strategic importance the site has for the district’s electricity distribution network, WELL contend that appropriate (subtle) recognition is contained within the policy in regard to the integrated nature of WELL’s operation within or adjacent to the substation yard.</p> <p>In consideration of the above, a minor amendment is sought to clause 1b) of INF-P24</p>	<p>b) <i>The extent to which the proposed development will avoid the potential reverse sensitivity effects on and amenity and nuisance effects of the National Grid Pāuatahanui Substation <u>and associated equipment.</u></i></p>



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	<i>Whether the building, structure or sensitive activity could be located further from the substation.</i>			
Infrastructure Rules and Standards				
	<p>Rules preamble:</p> <p><i>“Where an activity is not regulated by the NESETA (for example the activity does not relate to an existing transmission line that is part of the National Grid, or where new transmission lines and associated structures are proposed), the rules and standards in the District Plan apply.”</i></p>	Support in Part	<p>WELL consider that the wording used in the Rules preamble is remiss in regard to the definition for <i>Transmission Line</i> as current proposed in the PDP.</p> <p>The statement in the Rules preamble is not clear as it refers to <i>Transmission Lines</i> that are not part of the National Grid – yet the definition for <i>Transmission Line</i> is explicit that they <u>only</u> refer to the NESETA.</p> <p>WELL own and operate a significant network of Sub Transmission Lines across the Porirua District and wider Wellington Region. Such lines are designed to operate for higher voltage transmission purposes (i.e., transmission of high voltage electricity from Grid Exit Points to step-down zone substations and distribution substations), and consequently represent transmission lines that are discrete to the local-lines network – and hence are a part of WELL’s network that <i>“does not relate to an existing transmission line that is part of the National</i></p>	WELL seek that the PDP includes a definition, or other mechanism such as an advice note, to the effect that electricity transmission function is commonly undertaken outside of the NESETA – such as WELL’s Sub Transmission line function.



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			<p><i>Grid"</i>.</p> <p>In consideration of this perceived disconnect between the PDP definition for Transmission Line, and the Infrastructure Rules preamble, WELL seek that provision is made in the PDP for Transmission Lines that are not defined by the NESETA.</p>	
	<p>INF-S1</p> <p><i>Upgrading</i></p> <p><i>4. The diameter or width of a replacement pole or telecommunication pole:</i></p> <p><i>Must not exceed twice that of the replaced pole at its widest point as of 28 August 2020; or</i></p> <p><i>Where a single pole is replaced with a pi pole, the width of the pi pole structure must not exceed three times the width of the replaced pole as of 28 August 2020 at its widest point.</i></p> <p>...</p>	<p>Support in Part</p>	<p>WELL is uncertain as to why a limit of 3x pole widths is being applied in regard to Pi Poles.</p> <p>WELL network designers apply a number of variables in regard to support structures so as to achieve the most effective, safe and secure outcomes from an operational perspective.</p> <p>WELL do not support nominal design restrictions being presented in the PDP as such matters are best provided for under NZECP 34 and the applicable engineering parameters.</p> <p>Pi Pole structures are used for a number of reasons and are significantly influenced by the type of equipment to be supported by the pole structure, as well as mechanical load bearing calculations.</p> <p>In some instances a width greater than 3x the single pole width is required.</p> <p>Technical flexibility is sought by WELL in regard</p>	<p>WELL’s standard pi pole structure designs have pole centres at 2.4m, 3.0m, or 4.2m – consequently a 4.2m pi pole structure width is requested:</p> <p><i>Where a single pole is replaced with a pi pole, the width of the pi pole structure must not exceed three times the width of the replaced pole as of 28 August 2020 <u>or alternatively 4.2m as taken from the pole centres at its widest point.</u></i></p>



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			to technical considerations and the corresponding infrastructure standards of the PDP.	
	<i>6. The diameter of a replacement conductor or line must not exceed the diameter of the replaced conductor or line or 50mm, whichever is the greater.</i>	Support in Part	WELL can confirm their satisfaction on having replacement conductors having a 50mm diameter width. Notwithstanding the above, a minor drafting amendment is sought to the standard for clarity.	<i>6. The diameter of a <u>single</u> replacement conductor or line must not exceed the diameter of the replaced conductor or line or 50mm, whichever is the greater.</i>
	<i>7. Additional conductors or lines: Must not increase the number of conductors or lines as of 28 August 2020 by more than 100%; and Must not exceed a 50mm diameter.</i>	Support	WELL can confirm their satisfaction with Standard INF-S1(7).	Retain standard as currently drafted.
	<i>9. The number of additional poles required to achieve the conductor clearances required by NZECP 34:2001 must not exceed two.</i>	Oppose	WELL are uncertain as to the two (2) pole restriction for this proposed standard. A 2 pole standard is considered from an operational perspective to be an arbitrary restriction whereby any given terrain, in conjunction with NZECP34, should dictate the number of poles required.	<i>9. The number of additional poles required to achieve <u>the conductor clearances is limited to that in order to achieve NZECP 34:2001 compliance.</u> must not exceed two.</i>



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			<p>In all instances WELL will apply design efficiency in regard to line upgrades – whether it is 1 additional pole, or 3 additional poles, each section of upgrade will be designed on its merits and environmental context, particularly in regard to safety and NZECP34 compliance.</p> <p>Applying a quantitative limit for NZECP 34 compliance is not considered to be an appropriate mechanism to be included in the PDP – hence, WELL seeks removal of Standard INF-S1(9), or amended as sought.</p>	
	<p><i>10. Additional cross arms must not exceed the length of the existing cross arm as of 28 August 2020 by more than 100%, up to a maximum of 4m.</i></p>	<p>Support in Part</p>	<p>WELL note that the longest cross arm used on a single pole would be 3.6m.</p> <p>To clarify this standard, the following amendment is sought.</p>	<p><i>10. Additional cross arms <u>on a single pole structure</u> must not exceed the length of the existing cross arm as of 28 August 2020 by more than 100%, up to a maximum of 4m.</i></p>
	<p>INF-S8 <i>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</i></p>	<p>Support in Part</p>	<p>Upon review of standard INF-S8 WELL wish to advise Council that the spatial dimensions provided are too small to contain a temporary generator.</p> <p>As read, an area of 2m² is set for a generator – WELL consider that to enable a standard temporary generator to be established, an area of 20m² is provided for under the standard.</p> <p>In regard to ground mounted electricity</p>	<p>In consideration of operational requirements, the following amendments are sought to INF-S8:</p> <p>...</p> <p><i>1. It must not exceed a maximum height above ground level of 2m.</i></p> <p><i>2. It must not exceed a maximum area of <u>2 5m²</u>.</i></p>



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	<p><i>otherwise listed, which are located within the road reserve or rail corridor.</i></p> <p><i>1. It must not exceed a maximum height above ground level of 2m.</i></p> <p><i>2. It must not exceed a maximum area of 2m².</i></p> <p><i>3. It must not exceed a maximum height above ground level of 1.8m.</i></p> <p><i>4. It must not exceed a maximum area of 1.4m².</i></p>		<p>distribution cabinets, WELL seek that the area standard is increased to that of 5m² so as to provide an envelope for commonly used equipment contained within the road reserve.</p>	<p><i>3. It must not exceed a maximum height above ground level of 1.8m.</i></p> <p><i>4. It must not exceed a maximum area of 1.4m².</i></p> <p><u><i>5. In the case of temporary electricity generators and self-contained power units to supply existing infrastructure a 20m² area is applicable.</i></u></p>
	<p>INF-S9</p> <p><i>Cabinets, electric vehicle charging stations and 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 within the road reserve or rail</i></p>	<p>Support in Part</p>	<p>Upon review of standard INF-S9 WELL wish to advise Council that the spatial dimensions provided are too small to contain a temporary generator.</p> <p>As read, an area of 15m² is set for a generator not located within the road reserve or rail corridor – WELL consider that to enable a standard temporary generator to be established, an area of 20m² is provided for under the standard.</p> <p>The standard is requested to be amended as</p>	<p>1 ...</p> <p><i>2. It must not exceed a maximum area of 1520m².</i></p>



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	<i>corridor</i>		indicated.	
	INF-S14 Earthworks – Slope, height, depth and location	Support in Part	WELL agree with the Standard for Earthworks – Slope, height, depth and location; however, WELL consider appropriate that the NZECP34 exclusion provided to Transpower is equally applicable to WELL’s network operations. In consideration of the effect of the exclusion to INF-S14, WELL seek the amendments as indicated.	<i>This standard does not apply to: Earthworks undertaken by Transpower <u>or Wellington Electricity Lines Limited to achieve the ground to conductor clearance required by NZECP34:2001;</u></i>
	INF-S18 <i>Trimming, pruning or removal of indigenous vegetation within an area identified in SCHED7 - Significant Natural Areas</i>	Support	WELL support Standard INF-S18 as it explicitly provides exemptions provided under the <u>Electricity (Hazards from Trees) Regulations 2003</u>	Retain Standard INF-S18 as currently drafted.
	INF-S19 <i>Trimming, pruning, removal or works within the root protection area of a tree identified in SCHED5 - Notable Trees</i>	Support in Part	WELL support the protection of vegetation where possible; however, to give effect to policies INF-P18 and INF-P19 WELL seek that an exemption is provided so as to enable compliance with the <u>Electricity (Hazards from Trees) Regulations 2003</u>	WELL seek the following amendment to INF-S19: <i>3. Removal of a tree must only be undertaken where:</i> ... <i><u>Works that are being undertaken in accordance with the Electricity (Hazards from Trees) Regulations 2003</u></i>



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<i>Subdivision</i>				
SUB - Subdivision	<p>SUB-O2</p> <p><i>Servicing of allotments</i></p> <p><i>Subdivisions in Urban Zones are serviced by the Three Waters Network with sufficient capacity to accommodate any proposed or anticipated development and subdivisions in non-urban areas are able to be serviced through on-site measures.</i></p>	Support in Part	<p>WELL support the principle behind Objective SUB 02 in regard to the servicing of subdivision in urban and non-urban environments; however, WELL consider that the coverage of the Objective is broadened so as to include all Infrastructure (such as the electricity distribution network).</p> <p>WELL appreciate Council’s desire to adequately provide for three waters infrastructure – however, given that existing and proposed land use are dependent on a range of infrastructure services, a high-level Objective should be provided to robustly identify all infrastructure.</p> <p>WELL seek that Objective SUB-O2 is suitably expanded upon so as to include all key infrastructure and not favour Council’s three waters infrastructure.</p>	<p>WELL seek that the following amendments are made to SUB-O2:</p> <p><i>Subdivisions in Urban Zones are serviced by the Three Waters Network <u>Infrastructure</u> with sufficient capacity to accommodate any proposed or anticipated development and subdivisions in non-urban areas are able to be serviced through on-site measures.</i></p>
	<p>SUB-P1</p> <p><i>Creation of allotments</i></p> <p>...</p> <p><i>4. Ensure the safe operation, maintenance and access to any Regionally Significant</i></p>	Support	<p>WELL generally support SUB-P1, particularly in regard to ensuring the safe operation and maintenance, and access, to Regionally Significant Infrastructure.</p> <p>In consideration of WELL’s sought clarification of the RSI definition (to more explicitly cover WELL’s Sub Transmission lines) WELL are in</p>	Retain SUB-P1 as currently drafted.



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	<i>Infrastructure on or adjacent to the site, taking into account the outcome of consultation with the Regionally Significant Infrastructure owner;</i>		agreement with SUB-P1.	
	<p>SUB-P5</p> <p>Integration with infrastructure</p> <p>.....</p> <p><i>5. Ensuring telecommunications and power supply is provided to all allotments.</i></p>	Support	<p>WELL support the subdivision policy in regard to each new allotment to have connections in place.</p> <p>Such a policy sets a clear understanding for plan users and developers as to the need to enable network connections to newly created allotments.</p> <p>Such connections are to be available prior to the issuing of new Records of Title.</p>	Retain SUB-P5 as currently drafted.
	<p>SUB-S7</p> <p>Telecommunications and power supply</p> <p>...</p> <p><i>2. All new allotments must have provision for electricity connections to the legal boundary of the allotments.</i></p>	Neutral	<p>WELL support this standard in its entirety as it appropriately directs plan users to be aware of their obligations as a part of the subdivision process and the servicing of new allotments.</p> <p>WELL appreciated that there is a point of difference between what an allotment is compared to a property that is contained within its own Record of Title (i.e., a Record of Title may be created which contains a number of allotments) – hence, the final terminology to be adopted in the PDP may be subject to</p>	WELL seek the retention of SUB-S7 as currently drafted.



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			<p>change.</p> <p>Notwithstanding Council’s final determination of an allotment or a Record of Title, WELL seek that an appropriate service connection standard is in place – with such connection to be established prior to the new title issuance.</p>	