



**SUBMISSION BY POWERCO LIMITED ON THE CENTRAL HAWKE'S BAY
PROPOSED DISTRICT PLAN**

To: Proposed District Plan
Central Hawke's Bay District Council
PO Box 127
Waipawa 4240

Email: districtplan@chbdc.govt.nz

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

1. This is a submission by Powerco Limited (**Powerco**) on the Central Hawke's Bay Proposed 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 operation and access to the Takapau gas pipeline. The Takapau pipeline distributes gas from the District Regulator Station (DRS) on the corner of Nancy Road and State Highway 2, to the Silver Fern meat processing factory at 226 Fraser Road, Takapau. The pipeline is approximately 4km in length. Powerco wishes to protect its existing gas pipeline by ensuring 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 issues, 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, rules and standards 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 5th day of August 2021.

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



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

Schedule 1 – Submission by Powerco

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. Gas distribution pipelines are also recognised as "Strategic Infrastructure" within the Hawkes Bay Regional Policy Statement (**HBRPS**).
- 1.3. Powerco's gas distribution networks are split into five regions – Manuwatu, Taranaki, Wellington, Hutt Valley/Porirua and Hawke's Bay. Powerco distributes gas from the District Regulator Station (DRS) on the corner of Nancy Road and State Highway 2, to the Silver Fern meat processing factory at 226 Fraser Road, Takapau, as shown on the map attached as **Appendix A** to this submission, and therefore has an interest in the Central Hawke's Bay Proposed 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 pipeline needs to be operated, repaired, maintained and upgraded, and when required new gas distribution network infrastructure needs to be installed.

2. Gas Distribution Pipeline - Takapau

- 2.1. Powerco's gas distribution pipeline is an underground steel pipe that transports gas at a Low Intermediate Pressure (700 - 1200 kPa) from the DRS on the corner of Nancy Road and State Highway 2, to the Silver Fern meat processing factory on Fraser Road, Takapau. The gas distribution pipeline is approximately 4 km in length and ends at the Silver Fern meat processing Factory's installation control point.
- 2.2. The Takapau gas distribution pipeline is predominantly located within road (Oruawharo Road, Charlotte Street and Nancy Street) and farmland in the Rural Zone. The underlying

zoning for roads carries the same zoning as the land adjoining, so for the Takapau pipeline is also subject to the Settlement Zone where the road runs through the Takapau settlement. All roads are also designated in the Central Hawkes Bay District Plan.

- 2.3. 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.
- 2.4. It is critical that the planning documents that guide development within the Central Hawke's Bay District adequately provide for the core strategic infrastructure that is required to support growth. Unless these issues are appropriately addressed, the HBRPS 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 objectives and policies of the HBRPS;
 - Appropriate provision is made for the on-going operation, repair and maintenance of Powerco's Takapau pipeline, including ensuring that the pipeline can be accessed;
 - Appropriate provision is made for the existing gas pipeline 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.

3. General comments:

- 3.1. The HBRPS details how activities involving strategic infrastructure and renewable energy will be addressed. It recognises that some infrastructure is regionally important (including Powerco's gas distribution pipeline) 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 gas distribution pipeline within the District, that its management is comprehensively and appropriately addressed in the Central Hawke's Bay Proposed District Plan (**PDP**).

- 3.2. 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.
- 3.3. Powerco supports the separate Network Utilities 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 fourth paragraph of the introduction section in the Network Utilities Chapter states that because many network utilities are lineal, and traverse many parts of the district, it is considered appropriate that a single set of rules are provided which apply across the District. Powerco supports this clarity.
- 3.4. **Table 1** contains a detailed list of submission points that Powerco wishes to make on the PDP.

Table 1 – Detailed Submission Points from Powerco

Objective / Policy / Rule	Provision	Position	Reason for position	Relief Sought – additions bold and underlined, deletions strike through
Definitions				
New Definition - Gas Distribution Network	Definitions	New Definition Requested	New definition needed for the gas distribution network which operating at a pressure of less than 2,000 kilopascals. The Legend provides for 'Gas Transmission Network (Takapau Pipeline – Low Pressure)' which incorrectly refers to the gas transmission network. The Takapau pipeline is a gas distribution network operating at a Low Intermediate Pressure (700 - 1200 kPa), and accordingly a new gas distribution network definition is needed.	Add new definition Gas Distribution Network: <u>Gas Distribution Network: any gas pipeline with a pressure less than 2,000 kilopascals, inclusive of any incidental above or below ground equipment which forms part of the distribution network.</u>
	Definition of Network Utilities or Network Utility	Support	Powerco supports the definition.	Retain as notified.
	Definition of Network Utility Operator or Network Utility Operation	Support	Powerco supports the s166 RMA definition of Network Utility Operator.	Retain as notified.
NU – Network Utilities				
Network Utilities - Introduction	Fourth paragraph	Oppose	Powerco supports the fourth paragraph of the Network Utilities Chapter Introduction. The explanation of how the plan works is necessary for clarity. However, it should go on and ensure that users of the district plan understand which objectives, policies and rules apply to network utility activities.	Add further sentence to the end of the Fourth paragraph: <u>The objectives, policies and rules in this chapter are the only objectives, policies and rules that apply to Network Utility activities, however the following Part 2 – District-Wide Matters chapters may also be relevant to network utilities: EW – Earthworks, TRANS – Transport, HH – Historic Heritage, ECO – Ecosystems & Indigenous Biodiversity, SUB – Subdivision, EW – Earthworks, LIGHT – Light, and NOISE - Noise</u>

Objective / Policy / Rule	Provision	Position	Reason for position	Relief Sought – additions bold and underlined, deletions strike through
Network Utilities – Issues	NU-I1	Oppose	Powerco supports the issue setting out the essential role of network utilities. The issue gets restricted by referring to network utilities adverse effects. The adverse effects of network utilities are discussed in NU-I2.	Amend the issue to read: Network utilities have important functions and enable people and communities to provide for their health and safety and social, economic, and cultural wellbeing, but can have adverse effects on the environment, often due to their technical, operational and location-specific requirements.
	NU-I2	Oppose	Powerco opposes the issue recognising at times there are adverse effects of network utilities. The issue needs to go on to state that the adverse effects are often due to their technical, operational and location specific requirements.	Amend the issue as follows: Some network utilities and amateur radio facilities can have adverse effects on the environment, <u>often due to their technical, operational, and location-specific requirements.</u>
	NU-I3	Support	Powerco supports the issue addressing the effects of other activities on network utilities.	Retain the issue as notified.
Network Utilities – Objectives	NU-O1	Oppose	Powerco opposes the objective as it refers to providing essential and secure services. Services is defined in the PDP and does not include gas distribution connections nor electricity connections which are essential infrastructure. Connections should be added so that the objective applies to all network utility operations.	Amend the objective as follows: Recognise and provide for safe, efficient and resilient network utilities throughout the District that provide essential and secure services <u>and connections</u> , including in emergencies, that enable people and communities to provide for their health, safety and wellbeing.
	NU-O2	Support	Powerco seeks that the policy be amended to recognise that adverse effects of network utilities (especially new network utilities) may not be capable of being avoided, remedied or mitigated at times.	Amend the objective as follows: The adverse effects of network utilities on the environment are avoided, remedied or mitigated <u>as far as reasonably practicable</u> , while recognising the functional and operational needs of network utilities (including those associated with their scale, design and locational requirements).

Objective / Policy / Rule	Provision	Position	Reason for position	Relief Sought – additions bold and underlined, deletions strike through
	NU-O3	Support	Powerco supports recognising that network utilities may be compromised by allowing incompatible subdivision, land use or development locating in close proximity. Recognising that such incompatible activities may cause reverse sensitivity effects.	Retain as notified.
Network Utilities – Policies	NU-P1	Support	Powerco supports recognising the national, regional and local benefits of network utilities, including as lifeline utilities.	Retain as notified.
	NU-P2	Oppose	At times network utilities are required to be upgraded and new infrastructure is required to be installed to service the requirements of all buildings, sites and areas including those having Historic Heritage Items, Notable Trees, Wahi Tapu, Wahi Taonga and Sites of Significance to Maori, Significant Natural Areas and Outstanding Natural Features.	Amend the policy as follows: Avoid <u>significant adverse effects and remedy or mitigate other</u> adverse effects of upgrades to, and the development of new network utilities on the values and attributes of areas identified in the District Plan as: 1. Historical Heritage Items
	NU-P3	Support	At times network utilities are required to be upgraded and new infrastructure is required to be installed service the requirements of its customers wherever they are located including in High Character Areas and Significant Amenity Features. It is appropriate in these areas that significant adverse effects are avoided.	Retain as notified.
	NU-P4	Oppose	Powerco opposes this policy as it too broad e.g. natural and physical resources and amenity values are	Amend the policy as follows:

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			<p>extremely wide terms. Requiring 'compliance' with standards and guidelines in a policy is also not supported. The term 'appropriate network utilities' is very subjective, when it appears the intent is for it to apply to overhead electricity and communication lines.</p>	<p>Manage the effects of network utilities on the environment by:</p> <ol style="list-style-type: none"> 1. avoiding, remedying or mitigating adverse effects on: <ol style="list-style-type: none"> a. natural and physical resources; b. amenity values, including from shading, visual dominance, noise, vibration, light spill, traffic and access, dust nuisance; c. the safe and efficient operation of other network utilities, including effects on electricity transmission and the National Grid, gas transmission pipelines, road and rail networks, and infrastructural service networks; 2. requiring Assessing compliance with recognised standards and guidelines for the potential adverse effects of noise, vibration, radiofrequency fields and electric and magnetic fields; 3. encouraging the progressive undergrounding of appropriate network utilities overhead electricity and telecommunication lines in new areas of development within the General Residential, Rural Lifestyle, Large Lot Residential and Settlement Zones and the systematic replacement of existing overhead services with underground reticulation or the upgrading of existing overhead services within these areas, where this is technically and commercially viable; 4. Encouraging the co-siting and sharing of masts, facilities, utility corridors and other innovative solutions within residential environments and roads, where technically feasible and practicable; 5. Encouraging the removal of redundant and superseded network utilities.
	NU-P5	Support	Powerco supports protecting network utilities from the adverse effects of subdivision, use and development.	Retain the policy as notified.
NU – Network Utility Rules	NU-R1 Operation, maintenance, replacement, and	Support	Powerco supports the permitted activity for operation, maintenance,	Retain the rule as notified.

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	removal of existing network utilities (that are not regulated by an NES)		replacement and removal of existing network utilities.	
	NU-R2 Minor upgrading of existing network utilities	Support	Powerco supports the permitted activity for the minor upgrading of existing network utilities.	Retain the rule as notified.
	NU-R4 Construction of new network utilities, and upgrading of existing network utilities (that are not regulated by an NES), not already provided for in NU-R3 (within the National Grid Yard)	Support	Powerco supports the permitted activity for the construction of new network utilities.	Retain the rule as notified.
NU – Network Utility Standards	NU-S1 Gross Floor Area and Dimensions	Support	Powerco supports the Gross Floor Area and Dimensions for above ground buildings or structures.	Retain the standard as notified.
	NU-S2 Setbacks	Support	Powerco supports the setbacks provided for above ground buildings or structures.	Retain the standard as notified.
	NU-S3 Height for Above Ground Buildings and Structures	Support	Powerco supports the height restrictions provided for above ground buildings or structures.	Retain the standard as notified.
	NU-S2 Height in Relation to Boundary	Support	Powerco supports Height in Relation to Boundary provisions for above ground buildings or structures.	Retain the standard as notified.
EW - Earthworks				
EW – Earthworks Rules	EW-R1	Support	Powerco supports the permitted activity rules for earthworks associated with network utilities.	Retain the rule as notified.

Objective / Policy / Rule	Provision	Position	Reason for position	Relief Sought – additions bold and underlined, deletions strike through
EW – Earthworks Standards	EW-S2	Support	Powerco supports the standard applicable to earthworks in General Rural Zone.	Retain the standard as notified.
	EW-S3	Support	Powerco supports the standard applicable to Vertical Extent of Excavation.	Retain the standard as notified.
	EW-S4	Support	Powerco supports the standard applicable to site reinstatement	Retain the standard as notified.
	EW-S5	Support	Powerco supports the standard requiring erosion and sediment control.	Retain the standard as notified.
NH – Natural Hazards				
NH - Natural hazard Rules	NH-R1	Support	Powerco supports the permitted activity rule for network utilities in a Flood Hazard Area. Network utilities have to be installed wherever a customer chooses to locate, and at times such network utilities may need to be located in or traverse through Natural Hazard Areas.	Retain the rule as notified.
Planning Maps - Legend				
Legend – Gas Transmission Network (Takapau Pipeline – Low Pressure)	Legend – Gas Transmission Network (Takapau Pipeline – Low Pressure)	Oppose	The Takapau gas pipeline is a gas distribution pipeline owned by Powerco Limited. Accordingly, it needs correcting to 'Gas Distribution Pipeline'.	Amend the legend description as follows: Legend – Gas Transmission Network <u>Distribution</u> Network (Takapau Pipeline – Low <u>Intermediate</u> Pressure)

Appendix A- Powerco assets within the Central Hawke's Bay District boundaries



POWERCO

Powerco gas assets within Central Hawke's Bay District Council

POWERCO NETWORK



By using this data you agree to these terms. This data expires 3 months from 1/1/2019. Data shows approximate positions of Powerco assets as a guide only. No warranty of accuracy is given or implied. Data may not show all of Powerco's assets (e.g. recently installed, relocated or redundant assets). Measurements are indicative and if none are shown the position of asset is unknown. Powerco accepts no liability for any loss or damage arising from use of the data. No redistribution or modification is permitted. Before any excavation you must follow the www.beforeyoudig.co.nz enquiry process.

