

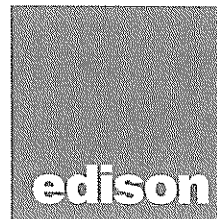
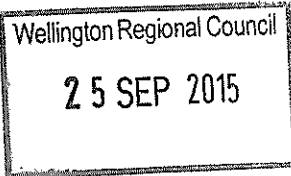
Proposed Natural Resources Plan:

Submitter:

Wellington Electricity Lines Limited

Submitter Number:

S126



25 September 2015

Edison Consulting Group Limited
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The Proposed Natural Resources Plan
Greater Wellington Regional Council
PO Box 11646, Manners Street
Wellington 6142

Transmittal via email: regionalplan@gw.govt.nz

Re: The Proposed Natural Resources Plan: Submission by Wellington Electricity Lines Limited

To whom it may concern

Please find attached to this letter a submission by Wellington Electricity Lines Limited ('WELL') on the Greater Wellington Regional Council Proposed Natural Resources Plan.

WELL considers that it could not gain an advantage in trade competition through this submission.

WELL wishes to be heard in relation to the attached submission.

Yours faithfully

A handwritten signature in black ink, appearing to read "Tim Lester". The signature is fluid and cursive.

Tim Lester

*On behalf of Wellington Electricity Lines Limited
c/- Edison Consulting Group
P O Box 875
Hamilton*

Form 5: Submission on the Proposed Natural Resources Plan for the Wellington Region
 This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to Clause 6 of Schedule 1, Resource Management Act 1991



To: Freepost 3156
 Wellington Regional Council
 PO Box 11646
 Wellington 6142

Your details

Full name: Tim Lester
 Organisation name (if applicable): Wellington Electricity Lines Limited
 Address for service: Edison Consulting Group
PO Box 875
Hamilton 3240
 Telephone no's: Work: _____ Home: _____ Cell: 021 993 223
 Contact person: Tim Lester
 Address and telephone no (if different from above): _____

Electronic communication

Wellington Regional Council has a preference for providing information about the Proposed Natural Resources Plan via email. We will send you updates on the process, information and provide you with details of any meetings and the hearing. Please tick here if you do not agree to receive communication via email.

Email address: tim.lester@edison.co.nz

Trade competition

I/we could not gain an advantage in trade competition through this submission [If you ticked this box, delete the rest of this section and go straight to 'Your submission']

I/we could gain an advantage in trade competition through this submission

If you could gain an advantage please complete one of the following:

I/we are directly affected by an effect of the subject matter of my submission that adversely affects the environment, and does not relate to trade competition or the effects of trade competition.

I/we are not directly affected by an effect of the subject matter of my submission that adversely affects the environment, and does not relate to trade competition or the effects of trade competition.

Your submission

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:
 Please continue on separate sheet(s) – an excel spreadsheet of all of the proposed plan provisions is available online www.gw.govt.nz/regional-plan-review

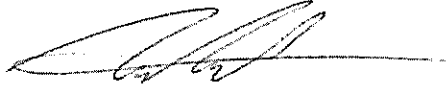
The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number): 	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	
	I seek the following decision from WRC (give precise details): →	

See attached

Attendance and wish to be heard at hearing(s)

- I/We do wish to be heard in support of my/our submission
[Note: This means that you wish to speak in support of your submission at the hearing(s).]
- I/We do not wish to be heard in support of my/our submission
[Note: This means that you cannot speak at the hearing. However, you will still retain your right to appeal any decision made by the Wellington Regional Council to the Environment Court.]
- If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Signature: _____



Date: _____

22/9/2015

[Person making submission or person authorised to sign
on behalf of person making submission. NB. Not required if making an
electronic submission]

Publication of details

Wellington Regional Council is legally required to notify a summary of submissions, including your name and address for service as provided on this submission form. Your name and address are included so that a person making a further submission is able to serve you with a copy of it.

**SUBMISSION BY WELLINGTON ELECTRICITY LINES LIMITED ON THE GREATER WELLINGTON
REGIONAL COUNCIL PROPOSED NATURAL RESOURCES PLAN**

25 September 2015

TO: Greater Wellington Regional Council

PO Box 11646,

Manners Street

Wellington 6142

BY EMAIL: regionalplan@gw.govt.nz

FROM: Wellington Electricity Lines Limited ("WELL")

PO Box 31049

Lower Hutt 5040

ADDRESS FOR SERVICE: Edison Consulting Group Limited

PO Box 875

Hamilton 3240

Attention: Tim Lester

Phone: 021 993 223

e-mail: tim.lester@edison.co.nz

1 About Wellington Electricity

- 1.1 Wellington Electricity Lines Limited ('WELL') owns and operates electricity network assets within the Wellington Region (Wellington City, the Hutt Valley and Porirua Basin). This network has a system length of 4,600km and serves around 165,000 connected consumers.
- 1.2 WELL is committed in its regulatory obligation to provide consumers in the Wellington Region with a responsive and secure supply of electricity, which in doing so provides a critical service to customers as well as a public good to local communities including hospitals, schools offices and residential dwellings.
- 1.3 WELL is a 'Lifeline Utility'. This is a term described in the Civil Defence and Emergency Management Act 2002 for organisations that provide essential infrastructure to the community. The Act says that lifeline utilities must "function at the fullest possible extent, even though this may be at a reduced level, during and after an emergency.
- 1.4 WELL owns distribution substations, lines and cables located in public road reserve, as well as on private property and along easements. In addition to the distribution network, WELL has the ability to own and operate high voltage (up to 110kV) transmission lines, and associated structures.
- 1.5 In addition to the supply of low-voltage (up to 1kV a.c.) connections to industrial, commercial and residential customers, WELL also owns and operates high-voltage sub-transmission infrastructure consisting of lines and substations.

2 WELL's Submission to the Proposed Natural Resources Plan

- 2.1 The purpose of the Proposed Natural Resources Plan (Proposed NRP) is to enable the Greater Wellington Regional Council (GWRC) to effectively carry out its functions pursuant to the Resource Management Act 1991 (RMA), thereby promoting the sustainable management of natural and physical resources.
- 2.2 WELL is responsible for the sustainable management, development and protection of a critical physical resource (electricity infrastructure) in a way which enables people and communities to provide for their social, economic, and cultural well-being pursuant to Section 5 of the RMA. The regional benefits of WELL's electricity assets across the Wellington region are further provided for in the RMA as set out in sections 7(b) and 7(ba).
- 2.3 While WELL is generally supportive of the Proposed NRP, submission points have been made to enhance relevant provisions in the Proposed NRP, and to enable the importance of critical distribution infrastructure across the region to be recognised. The specific submission points, and relief sought, to address concerns are set out below in tabular format.

3 Key issues for Wellington Electricity

3.1 Key themes for WELL that have been submitted on in the Proposed NRP include (but are not limited to):

- *The regional significance of the electricity distribution network.*
- *Appropriate and technically relevant definitions.*
- *The protection and unencumbered operation of WELL's network assets.*

4 Regionally Significant Infrastructure

4.1 A safe, secure and resilient electricity supply is critical for the sustainable function of modern-day society within the Wellington Region. Electricity contributes significantly to people's health and safety, as well as to their economic and social well-being.

4.2 The WELL electricity network¹ is made up of physical infrastructure that regulates and conveys electricity from National Grid Exit Points, and then supplying this electricity to end users at an appropriate voltage. The means in which this electricity supply system is enabled consists of two key phases:

1. High voltage transmission² of electricity from the National Grid (as taken from Grid Exit Points (GXP)) to zone substations.
2. Transformation at substations (stepping down of voltage) and distribution of electricity to customers.

These two functions, while inherently connected through a single comprehensive network, represent distinct functions that require appropriate recognition in the Proposed NRP as Regionally Significant Infrastructure.

4.3 To underpin the context for WELL's submission, the following discussion points are provided arguing why the definition of 'Regionally Significant Infrastructure' includes WELL's regional network of electricity infrastructure. These points include - consistency with the Wellington Regional Policy Statement (RPS); Application of the RPS definition in the NRP; and the Regional Significance of the Distribution Network.

Consistency with the Regional Policy Statement

4.4 As stated in the Greater Wellington Regional Council's Operative Regional Policy Statement (RPS):

"...infrastructure, including energy generation, transmission and distribution networks, are significant physical resources. This infrastructure forms part of national or regional networks and enables communities to provide for their social, economic, and cultural wellbeing and their health and safety..."

(RPS: page 34)

4.5 WELL acknowledge that the Wellington RPS is a broad, relatively high-level strategic planning document; however, its fundamental importance in accurately identifying significant regional infrastructure is a key element in guiding the direction and implementation of lower tier regional and local level planning documents.

¹ Network as defined in the Electricity Industry Act 2010 means a distributor's lines and associated equipment used for distribution.

² Termed sub-transmission within the distribution network

- 4.6 Notwithstanding the RPS' stated recognition of the regionally significant nature of distribution networks, the RPS definition of Regionally Significant Infrastructure is ambiguous in its articulation of the electrical distribution network. As worded in the RPS, regionally significant infrastructure includes facilities for the transmission of electricity where it is supplied to the 'network'; however, as clearly noted in the GWRC RPS Section 42A report, Council Officers considered that the definition for Regionally Significant Infrastructure included the electricity transmission network as defined by the Electricity Governance Rules 2003, and furthermore, that the RPS definition "...includes facilities for local distribution networks and the national grid."³
- 4.7 The RPS definition for Regionally Significant Infrastructure refers to the revoked Electricity Governance Rules 2003 in defining a 'network'. However, WELL consider that the RPS definition is not explicit enough in making it clear that the 'network' is contained within the definition, and consequently should be further clarified in the Proposed NRP.
- 4.8 Pursuant to Section 66(2)(d) of the RMA, the GWRC when preparing the Regional Plan must have regard to the extent that the document is consistent with the RPS. WELL contend that ensuring that the distribution network is appropriately defined as regionally significant infrastructure will not be inconsistent with the RPS.

RPS Definition for Regionally Significant Infrastructure in the Proposed NRP

- 4.9 As discussed above, the distribution network is stated in the RPS as being regionally significant; consequently, appropriate acknowledgement and consistency needs to be reflected in the NRP.
- 4.10 WELL acknowledges that GWRC has adopted the Proposed NRP definition for Regionally Significant Infrastructure from the RPS definition (as indicated by the * after the defined term); however, whilst the Proposed NRP definition is similar to that of the RPS – there is a key point of difference that requires clarification.

As currently worded, the two definitions state the following in regard to the supply of electricity:

Regionally Significant Infrastructure	
RPS	Proposed NRP
<ul style="list-style-type: none"> • facilities for the generation and transmission of electricity where it is supplied to the network, as defined by the Electricity Governance Rules 2003⁴ 	<ul style="list-style-type: none"> • facilities for the generation and transmission of electricity where it is supplied to the electricity distribution network, including the national grid.

- 4.11 While WELL can only assume why the Proposed NRP has used an alternative reference to the electricity distribution network and the national grid (presumably due the revocation of the Electricity Governance Rules 2003) it is considered that such a reference is pertinent to the definition as it identifies that electricity can be supplied by non-National Grid regionally significant infrastructure. However, as currently worded such non-grid network facilities are vague in not explicitly specifying that such infrastructure constitutes the distribution network.
- 4.12 WELL note that definitions for Regionally Significant Infrastructure contained in numerous other regional level planning documents throughout the country have resolved definition ambiguity, as currently exhibited in the Proposed NRP, by explicit inclusion of the distribution network in the definition (see **Attachment A**). Upon further investigation, it is

³ Staff Report: Proposed Regional Policy Statement for the Wellington region 2009 (Volume 2 page 389)
⁴ The Electricity Governance Rules 2003 was revoked in 2010

noted that the common rationale for the distribution networks explicit inclusion in the definitions is the recognition that the 'network' represents an integral 'backbone' for that region's local electricity supply. It is also recognised by other regional councils that such networks are in fact subject to the same kinds of land use pressure akin to that facing the National Grid (albeit it not at a national level).

- 4.13 In consideration of the Proposed NRP's ambiguous application of the defined term 'Regionally Significant Infrastructure', WELL seek that the definition be amended to explicitly identify the RPS intention that the electricity distribution network (or the word 'network' as defined in the Electricity Industry Act 2010) are Regionally Significant Infrastructure.

Regional Significance of the Electricity Distribution Network

- 4.14 WELL seek that the Proposed NRP appropriately recognises the regional significance of the region's electricity network by amending the proposed definition for Regionally Significant Infrastructure to include explicit reference to the 'network' as defined in the Electricity Industry Act 2010.
- 4.15 Notwithstanding the arguments expressed above as to the requirement to amend the Regionally Significant Infrastructure definition in the Proposed NRP; yet another compelling rationale for the sought amendment is the irrefutable fact that a secure supply of electricity across the region is critical to the safe and efficient functioning of modern society. WELL's distribution network takes high-voltage electricity from the nationally significant National Grid and strategically transmits it at a regional scale across large, geographically diverse, areas before being appropriately regulated locally for consumer use.
- 4.16 As graphically shown in **Attachment B⁵**, WELL's network transmits and distributes a critical supply of electricity across three expansive areas within the Wellington region. These Areas are:
- Southern (including South-western and the Wellington CBD);
 - North-western (including Porirua); and
 - North-eastern (including Lower Hutt and Upper Hutt).
- 4.17 The breadth and scope of WELL's 'network' mean that their facilities cannot solely be limited to district level environmental regulation, and furthermore, have a functional need to exist within a varied set of environments and natural settings in order to serve the region's large urban centres (Wellington City, Porirua City Upper Hutt City, Hutt City) and more remote communities.
- 4.18 The protection of WELL's network function is of critical importance to the region. In the event that the network is not appropriately provided for through the regions environmental policy framework, undue risk is presented whereby large populations of consumer's energy requirements will be placed in jeopardy through WELL's reduced ability to operate and maintain the network, as well as protection of the network against inappropriate land use activities occurring adjacent to the infrastructure.

5 Definitions

- 5.1 The Proposed NRP has been prepared with a focus on the sustainable management of natural and physical resources in the Wellington Region. The electricity distribution network is a physical resource in the region, and consequently is provided for in the Proposed NRP by virtue of the policy framework enabling the development, operation and maintenance of

⁵ As taken from Wellington Electricity Lines Limited 2015 Asset Management Plan

regionally significant infrastructure within the regions natural resource areas (i.e., coastal marine, wetland, rivers and lakes).

- 5.2 Given the Proposed NRP's policy framework, WELL has provided a number of submission points relating to how the definitions in the Proposed NRP would be more reflective of their operations in order to ensure the region's critical electricity supply can better function in harmony with the natural environment.
- 5.3 As detailed in the submission table below, WELL have sought amendments to several of the defined terms to be applied throughout the NRP, as well as seeking the addition of new definitions to facilitate the plan's implementation.

6 Individual Submission Points

- 6.1 The table below provides individual submission points made by WELL and provides a brief discussion of the submission as well as the changes (if any) that are sought.
- 6.2 Where the submission point identifies support or amendment, in some instances WELL have placed an *. This asterisk identifies that WELL's position is contingent on the definition for Regionally Significant Infrastructure being appropriately amended to explicitly reflect that a 'network' – as defined in the Electricity Industry Act 2010 – is contained within the meaning of the term.
- 6.3 In the event that the definition for Regionally Significant Infrastructure is not suitably amended, any support for the submitted on provision is retracted, and that an alternative definition and policy framework (i.e., Objectives, Policies and Rules) is provided for WELL's critical electricity facilities across the Wellington Region. The presence of an '*' represents a contingency for WELL to suitably protect their assets at the regional level through further development of the Proposed NRP - if so required.
- 6.4 WELL would be open to undertake a collaborative approach with Council in further developing their NRP submissions.

Proposed Natural Resources Plan (NRP) for the Wellington Region

NRP Provision	Support/Amend /Oppose	Comment	Relief Sought
Interpretation (Definitions)			
<p>Earthworks</p> <p>" ... Earthworks do not include:.... (d)(ii) electricity lines..."</p>	Support/Amend	<p>Whilst the definition for earthworks is generally supported by WELL in its intent (explicitly excludes electricity lines from the earthwork definition); the definition's exemption should similarly refer to associated structures as well.</p> <p>It is noted that telecommunication 'structures or lines' is referred to in the earthworks exemptions, therefore, in a similar vein, electricity lines <u>or structures</u> should also be excluded.</p>	<p>That the definition for Earthworks is retained; however the exemptions to the definition should be amended to read:</p> <p>" ... Earthworks do not include:.... (d)(ii) electricity <u>structures or lines</u>..."</p>
<p>Erosion prone Land</p> <p>"The pre-existing slope of the land exceeds 20 degrees."</p>	Amend	<p>WELL consider that the definition for Erosion Prone Land (EPL) is overly restrictive. WELL note that in the Regional Soil Plan, the EPL trigger was applied to slopes greater than 23 degrees and 28 degrees (depending on its Area classification). The proposed NRP definition combines both Area classes and applies a more onerous trigger.</p> <p>WELL considers that a EPL definition be applicable only to slopes greater than 25 degrees thereby representing middle ground with the Regional Soil Plan, as well as being consistent with EPL definitions in other regional planning documents⁶.</p>	<p>WELL request that the definition for Erosion Prone Land be applicable to slopes greater than 25 degrees.</p>
<p>Motor Vehicle</p> <p>A man-made device for land</p>	Amend	<p>WELL consider that the use of the term 'Motor Vehicle' in the Proposed NRP is not adequately supported by the</p>	<p>WELL submit that the definition for Motor Vehicle be amended by</p>

⁶ Waikato Regional Plan; BOP Regional Plan (35 degrees)

NRP Provision	Support/Amend /Oppose	Comment	Relief Sought
<p><i>transport, including, but not limited to cars, trucks, heavy machinery, motorbikes and bicycles, weighing up to 3,500kg and does not include prams, strollers, wheelchairs or other mobility scooters used by persons.</i></p>		<p>current definition.</p> <p>WELL, as do many network utility operators, requires the use of heavy vehicles in upgrading or maintaining their network (i.e. Hiab trucks and or loader cranes etc..). In many instances, such vehicles will exceed the weight restriction of 3,500kg consequently falling outside of the definition.</p> <p>Given the required task the vehicle is to perform (i.e., replacing structures within the coastal marine environment), the vehicle type will be determined on its capabilities and function for the given environment. The application of a 3,500kg restriction of the definition for Motor Vehicle is not practicable in regard to the maintenance or permitted upgrades to the region's infrastructure and should be removed from the definition.</p> <p>Without amending the definition as sought, many of the permitted activities specified on the Proposed NRP will not be able to be complied with for operational reasons.</p>	<p>removing the weight restriction of 3,500kg.</p>
<p>Offset <i>"A measurable positive outcome resulting from an action designed to compensate for the significant residual adverse effects on the environment arising from an activity after avoidance, remediation and mitigation measures have been taken."</i></p>	<p>Support</p>	<p>WELL consider that the use of the word 'offset' is appropriate in relation to their operations (particularly in regard to new developments), as an offset from the supply of electricity in itself is a positive outcome that is easily measurable.</p>	<p>WELL supports the term 'Offset' being defined in the Proposed NRP and seeks its retention unaltered.</p>

NRP Provision	Support/Amend/Oppose	Comment	Relief Sought
<p>Regionally significant infrastructure*</p> <ul style="list-style-type: none"> <i>the national electricity grid</i> <i>facilities for the generation and transmission of electricity where it is supplied to the electricity distribution network, including the national grid</i> <p>(note: * refers to the definition being taken from the Wellington Regional Policy Statement)</p>	<p>Amend</p>	<p>WELL note that the definition for Regionally Significant Infrastructure is derived from the Wellington RPS. However, for the reasons discussed in section 4 of this submission (i.e., the use of the word 'to' the electricity distribution network), WELL consider that the Proposed NRP definition is ambiguously worded and could incorrectly be interpreted by plan users to mean that Regionally Significant Infrastructure excludes the electricity distribution network.</p> <p>As contained within Attachment A of this submission, the electricity distribution network has been included in numerous regional planning documents throughout the country due to recognition that such networks provide critical services to people and communities that are not only restricted to a district by district significance. Given the increased recognition of the electrical distribution networks regional significance, WELL request that the Proposed NRP align itself with other regional planning documents and strategies and amend the definition for Regionally Significant Infrastructure as sought.</p> <p>By amending the definition as sought, WELL contends that the Proposed NRP will not be inconsistent with the Regional Policy Statement as discussed above in section 4 of this submission.</p> <p>Failure of the Proposed NRP to appropriately define the electricity distribution network will create confusion in interpreting the role, location and function of the region's electricity supply network with significant time and cost implications for both the network utility</p>	<p>WELL submit that the definition for Regionally Significant Infrastructure be amended to read:</p> <ul style="list-style-type: none"> <i>the national electricity grid</i> <i>facilities for the generation, transmission and distribution of electricity.</i> <i>a network (as defined in the Electricity Industry Act 2010).</i>

NRP Provision	Support/Amend/Oppose	Comment	Relief Sought
		<p>operator and Council. Furthermore, without including an appropriate definition for Regionally Significant Infrastructure, WELL will be compelled to seek alternative policy guidance to enable the protection and operation of the region's critical electricity distribution network. Such guidance will be in the form of amended objectives and policies currently relating to Regionally Significant Infrastructure.</p>	
<p>Temporary Structure <i>"A structure in the coastal marine area which is not in place for a period exceeding a total of 31 days or part days during a 12 month period, inclusive of the placement and removal."</i></p>	<p>Amend</p>	<p>The definition for temporary structure is applicable to WELL in the event that short-term or emergency works to the electricity supply network are required (i.e., a temporary line structure is required for maintenance). Given that such temporary structures can be used to compliment a much wider network in the event of outages, the duration for such structures may need to extend well beyond the 31 day limit currently stated in the definition. It is noted by WELL that in recent district plan changes in the region, a temporary structure (in this instance a temporary above ground line) was permitted in all land use zones as long as it was not required for a period of no more than 6 months. Such a period of time relating to temporary structures in the Proposed NRP should be applied to network utility structures given that their function and requirement often extends beyond that of other structures not associated with linier, interconnected, networks.</p>	<p>That the definition for Temporary Structures be amended to allow network utilities to erect and operate temporary structures for a period no more than 6 continuous calendar months.</p>

NRP Provision	Support/Amend/Oppose	Comment	Relief Sought
<p>Upgrade <i>“Use and development to bring existing structures or facilities up to current standards provided that the effects of the activity are the same or similar in character, intensity and scale as the existing structure and activity.”</i></p>	<p>Support</p>	<p>WELL consider that the proposed NRP definition for upgrade is appropriate for WELL’s network operations and activities. It is considered that provisions enabling the unrestricted ability to upgrade assets regardless of the environmental setting should be supported in the NRP.</p>	<p>WELL supports the term ‘Upgrade’ being defined in the Proposed NRP and seeks its retention unaltered.</p>
<p>Functional need <i>“When an activity is dependent on having its location in the coastal marine area or in the beds of lakes and rivers.”</i></p>	<p>Support</p>	<p>WELL consider that the identification of <i>functional need</i> addresses situations with respect to their assets being located within sensitive areas such as coastal, river, lake environments etc.. The functional need for WELL assets in such environments recognises the need for customers to be provided with a secure supply of electricity – thus enabling social and economic wellbeing.</p>	<p>WELL supports the term ‘Functional need’ being defined in the Proposed NRP and seeks its retention unaltered.</p>
<p>Vegetation clearance <i>“The clearance or destruction of woody vegetation (exotic or native) by mechanical or chemical means, including felling vegetation, spraying of vegetation by hand or aerial means, hand clearance, and the burning of vegetation.”</i></p>	<p>Amend</p>	<p>WELL consider that an exemption to the vegetation clearance definition should apply to the safe and efficient operation of electricity lines and substations. Such an exemption would be similar to the earthwork exemption indicated in the earthworks definition. The purpose of the vegetation clearance exemption would be to reflect WELL’s and landowner obligations under the <u><i>Electricity (Hazards from Trees) Regulations 2003</i></u>.</p>	<p>That the definition for vegetation clearance excludes trimming and maintenance activities associated with electricity supply networks. An amended definition for the vegetation clearance definition should read: <i>“The clearance or destruction of woody vegetation (exotic or native) by mechanical or chemical means, including felling vegetation, spraying</i></p>

NRP Provision	Support/Amend /Oppose	Comment	Relief Sought
			<p>of vegetation by hand or aerial means, hand clearance, and the burning of vegetation. <u>Vegetation clearance for maintaining and operating safe electricity supply networks is exempt from the definition of vegetation clearance.</u>"</p>
<p>Add a new definition for 'Maintenance'</p>		<p>It is noted by WELL that within the Proposed NRP the words Upgrade and Maintenance are commonly used in regard to infrastructure. In some instances, such words are used interchangeably (i.e., proposed Rule R197). To provide certainty to WELL maintenance activities, a definition is required in the Proposed NRP.</p>	<p>That a new definition for maintenance is provided i.e., "Maintenance means the replacement, repair or renewal of existing infrastructure and where the effects of that utility remain the same or similar in character, intensity and scale."</p>
Objectives			
<p>Objective O12 The social, economic, cultural and environmentally significant infrastructure and renewable energy generation activities are recognised.</p>	<p>Support*</p>	<p>Objective O12 appropriately recognises that infrastructure such as the electricity distribution network provides social, economic and environmental benefits from a regional and local perspective. WELL support Objective O12 contingent on a clarified definition for Regionally Significant Infrastructure being included in the Proposed NRP. In the event that Council is reluctant to clarify the definition for Regionally Significant Infrastructure as sought by WELL, WELL will revoke support for Objective O12 as it will not recognise the social, economic and environmental benefits the electricity distribution</p>	<p>On strict condition that the definition for Regionally Significant Infrastructure adequately encapsulates the electricity distribution network – WELL support Objective O12 as is currently worded.</p>

NRP Provision	Support*/Amend /Oppose	Comment	Relief Sought
<p>Objective O13</p> <p><i>The use and ongoing operation of regionally significant infrastructure and renewable energy generation activities in the coastal marine area are protected from new incompatible use and development occurring under, over, or adjacent to the infrastructure or activity.</i></p>	<p>Support*/Amend</p>	<p>provides to the Wellington Region.</p> <p>WELL consider that Objective O13 as currently worded is appropriate in recognising that infrastructure located within the coastal marine environment, inclusive of the regionally significant electricity distribution network, should be protected against incompatible land uses and reverse sensitivity.</p> <p>Failure to adequately have the distribution network recognised as regionally significant will compel WELL to withdraw support for Objective O13, and furthermore seek appropriate provisions are included in the Proposed NRP for distribution structures located within the coastal marine environment.</p> <p>Further to the above, WELL consider that the development or additional extensions of new infrastructure should also be included in the objective in order to reflect future scenarios stemming from consumer demand and regional growth.</p>	<p>WELL support Objective O13 contingent on its application to the regions electricity distribution network.</p> <p>However, WELL seek that the word development is included in the objective so to read:</p> <p><i>“The <u>development</u>, use and ongoing operation of...”</i></p>
Policies			
<p>Policy P8: <u>Beneficial activities</u></p> <p><i>The following activities are recognised as beneficial and generally appropriate:</i></p> <p>...</p> <p><i>(h) maintenance and use of</i></p>	<p>Support*</p>	<p>WELL note that Policy P8 reflects O12 and O13 and is understood to be encapsulating of existing structures such as those associated with the electricity networks, that are located in sensitive environments.</p> <p>It is important that such beneficial structures clearly and unambiguously include electricity structures and facilities due to functional need.</p>	<p>WELL support Policy P8 as is currently worded to the extent that it covers existing electricity structures and facilities that were legally established at the time of the Proposed NRP notification.</p>

NRP Provision	Support*/Amend /Oppose	Comment	Relief Sought
existing structures in the coastal marine area, natural wetlands and the beds of rivers and lakes...		In addition to the above, WELL consider that the term 'maintenance' is defined in the Proposed NRP as previously sought.	
<p><u>Policy P12: Benefits of regionally significant infrastructure and renewable electricity generation facilities</u></p> <p>The benefits of regionally significant infrastructure and renewable energy generation activities are recognised ...</p>	Support*	<p><i>Policy P12</i> relates, in part, to <i>Regionally Significant Infrastructure</i> within the Coastal environment and recognises that such infrastructure is strategically integrated, has locational requirements, has functional need and unique operational requirements.</p> <p>WELL consider that the policy is directly applicable to the region's critical electricity distribution network given the function of the network in supplying a secure supply of electricity to people and communities across the region. Consequently, a strong reassurance that the region's electricity distribution network are clearly defined as regionally significant infrastructure needs to be made in the Proposed NRP.</p>	WELL support <i>Policy P12</i> as currently worded to the extent that WELL's distribution network is appropriately recognised as Regionally Significant Infrastructure.
<p><u>Policy P13: Existing regionally significant infrastructure and renewable electricity generation facilities.</u></p> <p>The use, operation, maintenance, and upgrade of existing regionally significant infrastructure and renewable energy generation activities are beneficial and generally appropriate.</p>	Support*/Amend	<p>Similar to <i>Policy P12</i>, <i>Policy P13</i> seeks to recognise that existing Regionally Significant Infrastructure is beneficial to the communities' social and economic requirements. Furthermore, the policy sets in place the relevant permitted activity rules for such assets within the coastal, Lake and/or river environments of the Wellington Region.</p> <p>As one of the network operators for the region's critical electricity distribution network, WELL supports the concept behind the policy; however, WELL feels that the word 'generally' dilutes the impact of the policy and</p>	<p>WELL support <i>Policy P13</i> to the extent that WELL's critical distribution network is appropriately recognised as Regionally Significant Infrastructure.</p> <p>WELL seeks that <i>Policy P13</i> is amended to remove the word "generally".</p>

NRP Provision	Support/Amend/Oppose	Comment	Relief Sought
<p>Policy P14: Incompatible activities adjacent to regionally significant infrastructure and renewable electricity generation activities Regionally significant infrastructure and renewable energy</p>	<p>Support*</p>	<p>should be removed.</p> <p>Policy P14 relates to avoiding adverse reverse sensitivity effects on existing Regional Significant Infrastructure (i.e., earthworks, buildings etc.). Such a policy is relevant to WELL's network and is supported.</p>	<p>Policy P14 is supported to the extent that WELL's critical distribution network is adequately recognised under the definition of Regionally Significant Infrastructure.</p>
<p>Policy P132: Functional need and efficient use</p>	<p>Support</p>	<p>WELL understand Policy P132 recognises that some structures in the coastal marine environment have an operational requirement to be located there. It is considered that this policy reflects WELL's requirement to place structures in the coastal marine environment and is supported.</p>	<p>WELL support Policy P132 as currently worded.</p>
<p>Policy P138: Structures in sites with significant values <i>...(d) it is necessary to enable the development, operation, maintenance and upgrade of regionally significant infrastructure...</i></p>	<p>Support*</p>	<p>Policy P138 is applicable to WELL's distribution network assets located (or are required to be located in future) within sites with significant values. Contingent on WELL's network being adequately captured by the Regionally Significant Infrastructure definition, the policy is beneficial and is supported.</p>	<p>WELL support Policy P138 to the extent that WELL's 'network' is a recognised component of Regionally Significant Infrastructure.</p>
<p>Policy P139: Seawalls <i>The construction of a new seawall is inappropriate except where the seawall is required to protect:</i></p>	<p>Support/Amend</p>	<p>Whilst WELL generally support Policy P139, this support is contingent on the effects of the seawall not adversely impacting existing regionally significant infrastructure such as the critical distribution network located within the coastal marine, or river environment.</p>	<p>WELL support Policy P139, however seek that a new provision is included in the policy to ensure the seawall design is undertaken in consideration/agreement with other</p>

NRP Provision	Support/Amend /Oppose	Comment	Relief Sought
<p>(b) new regionally significant infrastructure,</p>		<p>An example of such an adverse effect would be the construction of a seawall over, or within close proximity to, an existing high-voltage electricity line with the requirement for the asset owner to relocate the infrastructure at their expense.</p>	<p>existing infrastructure owners.</p>
<p>Policy P143: <u>Deposition in a site of significance</u> <i>Deposition of sand, shingle or shell in a site identified in Schedule C (mana whenua), Schedule E4 (archaeological sites), Schedule F4 (coastal sites), Schedule F5 (coastal habitats) and Schedule J (geological features) shall be avoided except where:</i> ... (f) it is necessary to enable the efficient development, operation, maintenance and upgrade of regionally significant infrastructure,</p>	<p>Support*</p>	<p>Policy P143 is applicable to maintenance and upgrade works commonly undertaken by WELL's for their critical electricity distribution network. Consequently, WELL support the recognition in Policy P143 that deposition of sand, shingle and shell in significant sites is appropriate.</p>	<p>Contingent of Regionally Significant Infrastructure being defined as including the critical electricity distribution network, WELL support Policy P143 as currently worded.</p>
<p>Policy P144: <u>Dumping in a site with significant values</u> <i>Dumping in a site identified in shall be avoided except where:</i> (a) it is necessary to enable the development, operation,</p>	<p>Support*</p>	<p>Policy P144 is applicable to maintenance and upgrade works commonly undertaken by WELL for their critical electricity distribution network (i.e., vegetation or earthworks overburden deposition). Consequently, WELL support the recognition in Policy P144 that deposition of sand, shingle and shell in significant sites is</p>	<p>Contingent of Regionally Significant Infrastructure being defined as including a 'network', WELL support Policy P144 as currently worded.</p>

NRP Provision	Support/Amend/Oppose	Comment	Relief Sought
<p><i>maintenance and upgrade of regionally significant infrastructure, and...</i></p>		<p>appropriate.</p>	
<p>Policy P147: Motor vehicles on the foreshore Policy P148: Motor vehicles in sites with significant value ... with the exception of vehicles associated with... (d) the development, operation, maintenance and upgrade of regionally significant infrastructure.</p>	<p>Support*/amend</p>	<p>Policies 147 and 148 set in place a regulatory regime allowing for WELL's maintenance activities to take place within coastal or otherwise sensitive environments. In consideration of this allowance, WELL is support of the policies. Notwithstanding the above support, as indicated in the submission point relating to the definition for Motor vehicles, WELL restricts its support to Council's adoption of the sought amendment (removing the 3,500kg weight restriction to the definition). Given that there may be instances where vehicles with a weight greater than 3,500kg are required to maintain and upgrade their assets, the currently worded definition is inappropriate and does not reflect WELL's (and many other network utility operators) operational requirements.</p>	<p>WELL support Policies P147 and 148 to the extent that WELL's critical electricity distribution network is a recognised component of Regionally Significant Infrastructure. WELL support Policies P147 and 148 to the extent that WELL's submission point relating to the removal of the 3,500kg weight restriction is removed from the definition of 'Motor Vehicle'.</p>
Rules			
<p>Rule R12: <u>Emergency power generators – permitted activity</u> The discharge of contaminants into air from combustion equipment not exceeding a maximum generating capacity of 300kW, but up to 2MW in (a) applies from the combustion of</p>	<p>Support/amend</p>	<p>WELL generally support Rule R12 as it recognises that power generators are required from time to time in the event normal supply is interrupted. WELL support the provision in the Rule where generators up to 2MW are permitted in relation to the electricity supply network. WELL seeks that the rule is slightly amended to include</p>	<p>WELL seek that an amendment to Rule R12 is made that encapsulates planned maintenance activities where by temporary non-grid power is required. WELL seeks that Rule R12 is amended to read: "The discharge of contaminants into</p>

NRP Provision	Support/Amend/Oppose	Comment	Relief Sought
<p>diesel, petrol, natural gas or liquefied petroleum gas, to provide emergency power generation, when:</p> <p>(a) the electricity network is disrupted through weather, accidents, or any unforeseen circumstances, or</p> <p>...</p>		<p>general maintenance activities where by power supply to a given location may be interrupted as a result of routine maintenance, and is not the result of an emergency or unforeseen circumstance.</p>	<p>air from combustion equipment not exceeding a maximum generating capacity of 300kW, but up to 2MW in (a) applies from the combustion of diesel, petrol, natural gas or liquefied petroleum gas, to provide emergency power generation, when:</p> <p>...</p> <p>(c) the electricity connection is not available due to planned outages."</p>
<p>Rule R100: Vegetation clearance on erosion prone land – permitted activity</p>	<p>Amend</p>	<p>WELL has submitted on the definition for vegetation clearance to be amended to exclude electricity maintenance works. However, it is also considered appropriate to amend Rule R100 to the extent that mandatory vegetation clearance for the safe and efficient supply of electricity is explicitly included in the permitted activity rule.</p> <p>As indicated in the vegetation clearance definition amendment, the <u>Electricity (Hazards from Trees) Regulations 2003</u> stipulates vegetation clearance distances for various voltage conductors.</p> <p>To ensure WELL has uninhibited ability to maintain the Scheduled Growth limit zones, it is requested that Rule R100 allows for such maintenance works to occur as permitted.</p>	<p>WELL seeks that Rule R100 is amended as follows:</p> <p>"The use of land, and the discharge of stormwater into water or onto or into land where it may enter water from vegetation clearance of a contiguous area up to 2ha per property per 12 month period on erosion prone land is a permitted activity, provided the following conditions are met:</p> <p>...</p> <p>(c) The vegetation clearance is associated with <u>electricity structure maintenance.</u>"</p>
<p>Rule R104: <u>Structures in natural wetlands and significant natural</u></p>	<p>Support</p>	<p>WELL own and operate linear infrastructure that may require structures to be located within wetlands due to</p>	<p>WELL support Rule R104 as currently worded.</p>

NRP Provision	Support/Amend /Oppose	Comment	Relief Sought
<p><u>wetlands – permitted activity</u></p> <p>The maintenance, repair, addition, alteration, or replacement (like for like) of an existing structure, and the placement of a new structure of an area less than 10m² for the purpose of hunting and recreation (including maimai and jetties), and the removal of an existing structure in a natural wetland or significant natural wetland, including any associated ...</p>		<p>functional need.</p> <p>Due to the linear nature of WELL structures Rule R104 is considered to be appropriate as it relates to maintenance, repair, addition, alteration, or replacement of existing structures in wetlands as a permitted activity. However, the permitted activity standard for Rule R104 refers to only hand held machinery as being able to be used for such permitted works. Undertaking maintenance, repair, addition, alteration or replacement works for electricity infrastructure cannot, in all instances, be undertaken solely with hand held machinery with the default being the activity becoming a Discretionary activity.</p> <p>WELL appreciates that wetlands contain, or are, ecologically sensitive environments, and any works required to be undertaken in such environments will be need to be undertaken sympathetically and in accordance with the standards contained within Section 5.5.2. However, when required to undertake works on existing structures, WELL consider the Discretionary Activity Rule R107 is excessive.</p> <p>WELL consider that a less onerous activity status should apply to maintenance, repair, addition, alteration, or replacement works as it relates to <i>existing</i> infrastructure structures located in wetlands. In the event non-hand held machinery is required (such as would be the case for a pole replacement), a controlled activity status would be more appropriate. Such control would include the provision of a construction management plan prior</p>	<p>WELL submit that a new Rule is included in the NRP allowing for maintenance, repair, addition or replacement of existing regionally significant infrastructure structures as a Controlled Activity. The new rule should be worded as follows:</p> <p>Rule RXX: Activities in natural wetlands and significant natural wetlands – Controlled activity.</p> <p><i>Activities for the purpose of maintenance, repair, addition, alteration, or replacement (like for like) of an existing structure, that are not permitted by rules R104 and R105, are controlled activities provided the following condition is met:</i></p> <p>(a) <u>The activities relate to existing structures that are components of regionally significant infrastructure;</u></p> <p>(b) <u>the activity shall comply with the wetland general conditions for activities in natural wetlands, significant natural wetlands and outstanding natural wetlands specified above in Section 5.5.2.</u></p>

NRP Provision	Support/Amend /Oppose	Comment	Relief Sought
		<p>to the works commencing, and would outline how the works would mitigate any potential adverse environmental effects.</p> <p>WELL consider that having a lessened activity status is appropriate given that the subject structures would be existing, and having already gone through an environmental assessment process.</p> <p>The Controlled Activity Rule would not include new structures to be located within wetlands.</p>	
Rule R112: <u>Maintenance, repair, replacement, upgrade or use of existing structures (excluding the Barrage Gates) – permitted activity</u>	Support	<p>WELL understands that works on structures located within lake or river beds are permitted by proposed Rule R112.</p> <p>WELL support Rule R112 as currently worded as it allows electricity lines to be attached to existing structures (i.e., a bridge) as a permitted activity.</p>	WELL supports Rule R112 and seeks its retention unaltered.
Rule R117: New structures – permitted activity Rule R118: Removing or demolishing structures – permitted activity	Support	WELL has reviewed the permitted activity rules for new structures (and removal of structures) in the bed of a river or lake. In consideration of this review, WELL consider that they are appropriate and hence acceptable in consideration of WELL's activities	WELL support the inclusion of Rules R117 and R118 unaltered.
Rule R122: Removing vegetation – permitted activity	Support	WELL consider that Rule R122 suitably allows for the maintenance of their network by permitting vegetation clearance within the beds of lakes and rivers. In particular WELL support permitted activity condition (m) as it refers to vegetation that could threaten infrastructure.	WELL seek that the permitted activity condition (m) for Rule R122 is retained unaltered.

NRP Provision	Support/Amend/Oppose	Comment	Relief Sought
<p>Rule R149: <u>Maintenance or repair of structures – permitted activity</u> <i>The maintenance or repair of a structure in the coastal marine area, including any associated:</i></p> <ul style="list-style-type: none"> <i>(a) occupation of space in the common marine and coastal area, and</i> <i>(b) disturbance of the foreshore or seabed, and</i> <i>(c) deposition in, on or under the foreshore or seabed, and</i> <i>(d) discharge of contaminants, and</i> <i>(e) diversion of open coastal water</i> <p><i>is a permitted activity, provided the following conditions are met:</i></p>	<p>Support</p>	<p>Maintenance or repair works on structures located within the coastal marine environment are permitted by proposed Rule R149.</p> <p>Such recognition of works that are undertaken by WELL in the Proposed NRP is supported.</p>	<p>WELL support Rule R149 unaltered.</p>
<p>Rule R150: <u>Minor additions or alterations to structures – permitted activity</u> <i>The addition or alteration to a structure and the associated use of the addition in the coastal marine area, including any associated...</i></p>	<p>Amend</p>	<p>WELL consider that the permitted activity standards for minor alterations are generally acceptable; however, to allow for the possibility of a minor deviation to an electricity line (i.e., when replacing a pole) Rule R150 should provide for a <u>relocation footprint of within 5m radius</u> of the existing structure as permitted.</p> <p>WELL note that recent district plan changes in the region provided a relocation allowance for network utility structures of a 5m radius from the existing structure.</p>	<p>WELL submit that Rule R150 is amended to enable structures to be relocated within a 5m radius of its existing position as a permitted activity in the coastal marine environment.</p> <p>WELL seeks that Rule R150 be amended as follows: <i>(j) the minor addition or alteration</i></p>

NRP Provision	Support/Amend /Oppose	Comment	Relief Sought
		Consequently, WELL consider it appropriate for the Proposed NRP to be consistent to the spatial elements for structure relocations.	<u>shall be within a 5m radius of the original structure, shall add no more than 5m in horizontal projection and 1m in vertical projection to the structure as it existed on the date of public notification of the Proposed Natural Resources Plan (31.07.2015) in the coastal marine area, and</u>
<p>Rule R182: <u>Occupation of space by a structure owned by a network utility operator – permitted activity</u></p> <p><i>The occupation of space in the common marine and coastal area by a structure existing before the date of public notification of the Proposed Natural Resources Plan (31.07.2015) owned by a network utility operator is a permitted activity.</i></p>		<p>Rule R182 is directly applicable to WELL as a Network Utility Operator, and their existing assets that may be located within marine or coastal environments.</p> <p>R182 specifically states ‘structures’; it is considered that the word ‘facility’ (i.e., a distribution substation) should be included in the rule for certainty.</p>	<p>WELL submits that Rule R182 is slightly amended to include the word ‘facility’.</p> <p>Once amended Rule R182 would read:</p> <p><u>“Occupation of space by a structure or facility owned by a network utility operator – permitted activity”</u></p>
<p>Rule R197: <u>Motor vehicles for certain purposes – permitted activity</u></p> <p>The disturbance of the foreshore or seabed from motor vehicles in the coastal marine area, for the following purposes:</p>	<p>Support</p>	<p>WELL note this rule gives effect to Policies P147 and P148 addressed above.</p> <p>Given the need for vehicle access in all natural resource areas to WELLS critical distribution assets – Rule R197 is supported; however, this support is contingent on the definition for motor vehicle be amended to not limit weight restrictions to 3,500kg.</p>	<p>WELL supports Rule R197 as it permits the ability to use vehicles in the coastal marine environment for the purposes of maintenance of infrastructure.</p>

<i>NRP Provision</i>	<i>Support/Amend /Oppose</i>	<i>Comment</i>	<i>Relief Sought</i>
<p>...</p> <p>(d) the maintenance, upgrade and operation of regionally significant infrastructure.</p>			

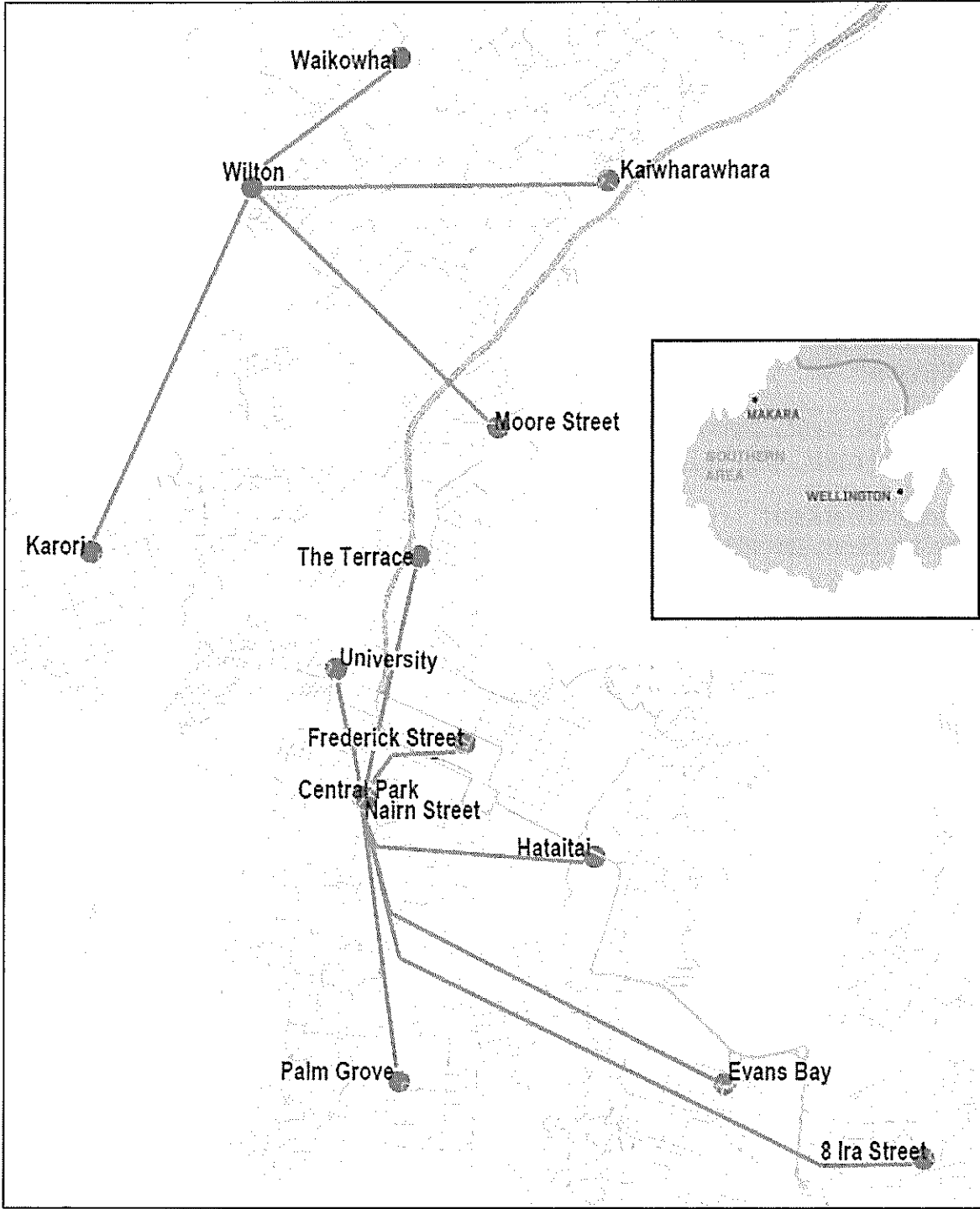
Attachment A

Definitions for Regionally Significant Infrastructure as taken from a selection of other recently review Regional Planning documents throughout the country

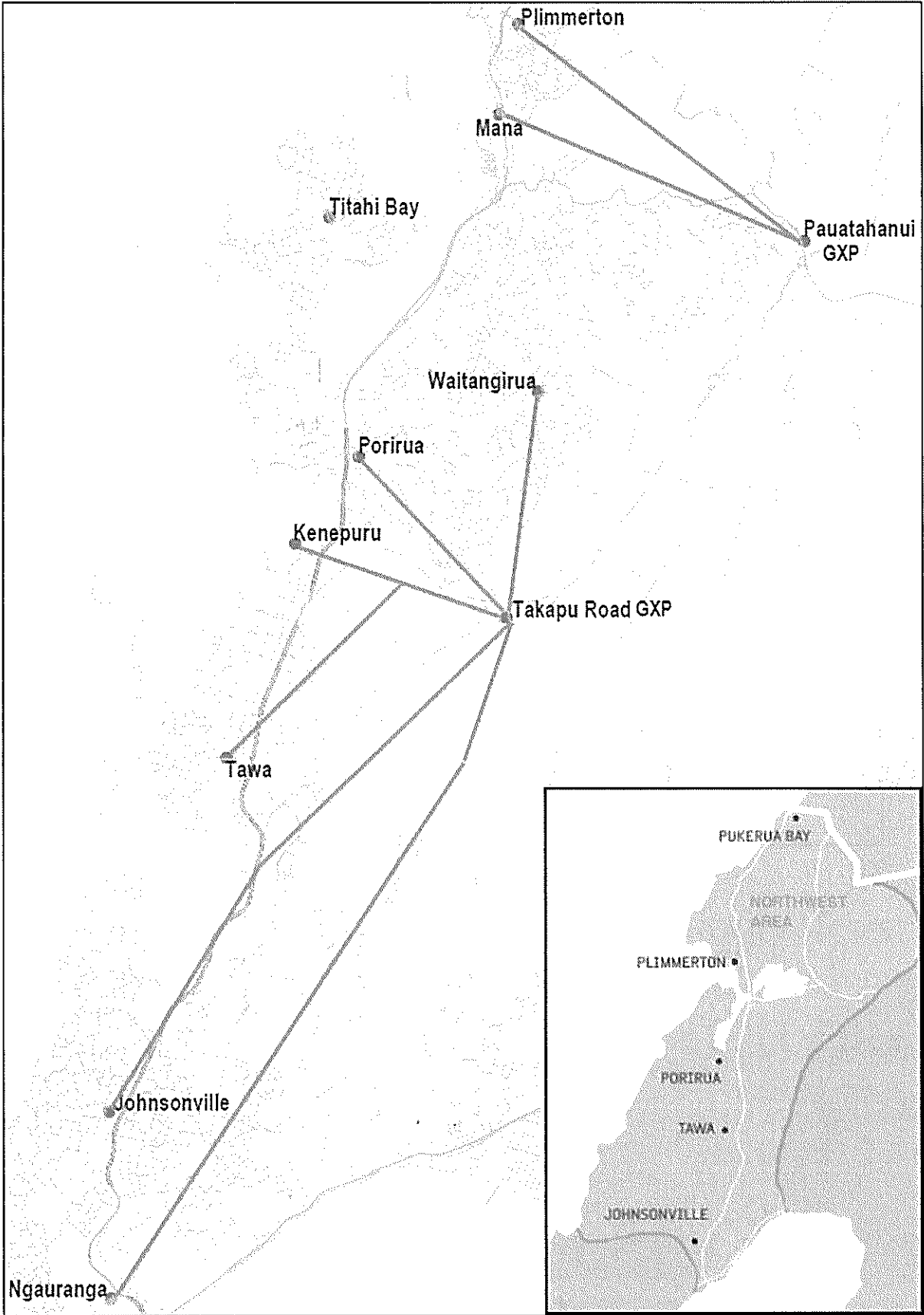
Document	Regionally Significant Infrastructure Definition
<u>Proposed Regional Policy Statement for Northland</u>	“... (d) Network electricity lines and associated infrastructure that constitute the sub-transmission network; (e) Electricity distribution assets which supply essential public services (such as hospitals or lifelines facilities), large (1MW or more) industrial or commercial consumers, 1000 or more consumers or are difficult to replace with an alternative supply if they are compromised; ...”
<u>Auckland Council Regional Policy Statement</u>	“... Energy and telecommunications networks, including electricity generation facilities (such as Otahuhu A and Otahuhu B) and electricity distribution networks”
<u>Proposed Waikato Regional Policy Statement</u>	“a network (as defined in the Electricity Industry Act 2010);”
<u>Proposed West Coast Regional Policy Statement</u>	“The National Grid and electricity distribution and transmission networks defined as the system of transmission lines, sub transmission and distribution feeders and all associated substations and other works to convey electricity;”
<u>Canterbury Regional Policy Statement</u>	“Electricity distribution network”
<u>Southland Regional Policy Statement</u>	“Facilities for the generation and transmission of electricity where it is supplied to the national electricity grid and local distribution network.”

Attachment B

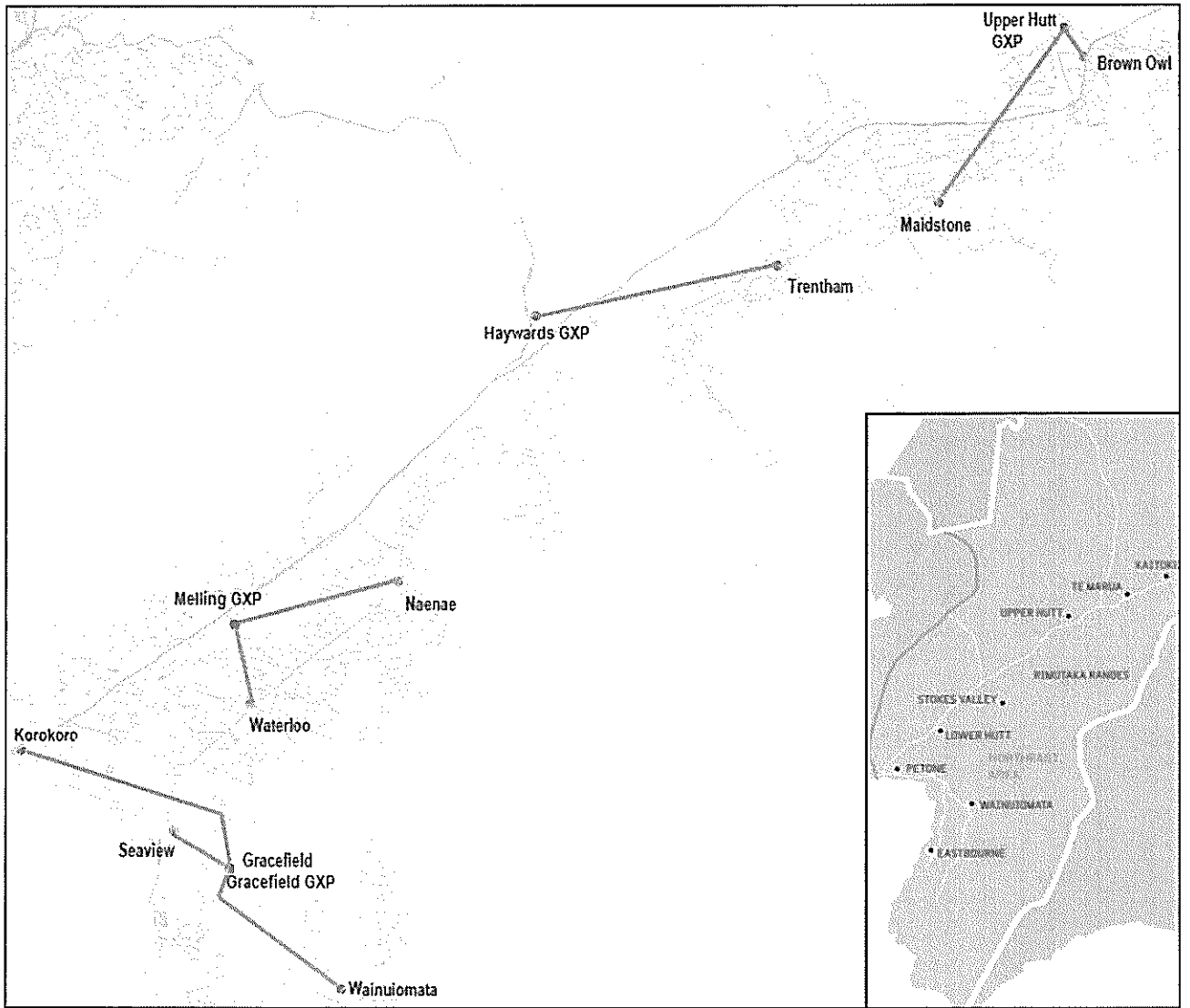
Sub transmission interconnectivity within Wellington South, Northwest and Northeast respectively.



Wellington Southern Area Sub transmission Network



Wellington North-western Area Sub transmission Network



Wellington North-eastern Area Sub transmission Network