



17 August 2018

Ministry for the Environment  
PO Box 10362  
**WELLINGTON 6143**

By email: [planningstandards@mfe.govt.nz](mailto:planningstandards@mfe.govt.nz)

Dear Sir/Madam,

**Submission on the National Planning Standards**

Please find **attached** to this letter WEL Networks' submission on the National Planning Standards.

If you have any questions relating to this submission, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'K. Broughton'.

Karleen Broughton  
**Commercial Legal Counsel**

E-mail: [REDACTED]

# 8373319

## **Submission by WEL Networks Limited on the Draft National Planning Standards – District Plan Structure**

### **INTRODUCTION**

WEL Networks Limited (“WEL”) is an electricity distributor operating under the Electricity Act 1992, which owns, operates and develops electricity distribution infrastructure in the Waikato region to provide line function services to approximately 91,000 installation connection points. This includes the distribution of electricity to residences and businesses within Hamilton City and the Waikato and Waipa Districts.

WEL owns and manages utilities within the road reserve (both overhead and underground), owns sites which contain substations and/or switching stations and has utilities within private land authorised by easements or protected under the Electricity Act (usually overhead lines, underground cables and distribution transformers).

WEL, as a network utility operator under the Resource Management Act 1991 (“RMA”), has the responsibility of providing a secure and efficient supply of electricity to the community within WEL’s distribution network area. WEL’s network of cables and lines allows every household, business, school, medical facility and other types of consumer to have access to electricity.

Other infrastructure such as substations, switching stations, ring main units, transformers, service pillars and pillar boxes allow WEL to convert electricity from a higher voltage (taken from the national grid) to a useable voltage for consumers to access, and to provide an enhanced level of security of supply through built-in redundancy in the network. WEL is classified as a lifeline utility under the Civil Defence Emergency Act 2002 and is also a requiring authority under the RMA.

### **DRAFT NATIONAL PLANNING STANDARDS SUBMISSION**

WEL supports the proposal by the Ministry for the Environment to implement Draft National Planning Standards for regional and district plans. The Draft National Standards as proposed will provide more consistency and a greater understanding of plans in addition to being more user-friendly.

WEL has reviewed the draft standard and provides comments under the following headings:

#### **Individual draft planning standards**

WEL supports the level of standardisation proposed in the plan structure standards.

Currently there is a lack of consistency in plans for electricity infrastructure and associated activities where the same activity could be permitted under one plan and discretionary in the next. This creates difficulties for WEL as its infrastructure is linear and crosses over multiple district boundaries within the network area.

WEL’s operations usually fit under a network utilities chapter within district plans.

WEL supports the implementation of a standalone network utilities chapter, rather than network utility rules contained in separate zone chapters. Other provisions such as noise and lighting should have standalone chapters as these activities occur at a district-wide scale and are not confined to a single zone.

### **Standard network utility provisions**

WEL supports the inclusion of standard network utility provisions for distribution infrastructure. If standard network utility provisions for distribution companies such as WEL were established and incorporated into district plans on a nation-wide scale, this would provide consistency and certainty, and reduce costs for all parties participating in planning processes.

WEL has found it increasingly difficult to communicate the importance of its infrastructure during reviews of district plans. An example of such difficulties was a district plan that was notified several years ago. This plan as drafted would have created huge implications for WEL in that it required comprehensive resource consenting for almost all of WEL's day-to-day activities within road reserve where the effects of such equipment were minor. Upon attending a number of meetings with Council, it was apparent that those responsible for drafting the network utilities chapter of the district plan did not have a full appreciation of the equipment required to operate a distribution network. Due to the lack of understanding, it took a number of years to create appropriate rules to enable WEL to operate its network effectively and efficiently.

A few years later another draft district plan was released for comment in WEL's network area and WEL requested the same amendments in order to effectively operate its network. WEL expended a lot of cost and effort to ensure these plans did not hinder WEL's operation of its network, and resulted in almost identical outcomes for each Council plan.

### **Lack of consistency in District Plans**

An example of the lack of consistency across plans is where WEL proposed to install a new overhead electricity line within a rural area, which would cross two local authority boundaries. While the activity was permitted in the first district area, the second Council required resource consent for earthworks associated with the proposed works as a discretionary activity, due to the area having a catchment policy overlay.

The incorporation of standard network utility provisions would ensure that essential works are not delayed or otherwise impacted by inconsistent rules within district plans.

### **Mapping**

WEL supports a consistent approach to zones, overlays and other spatial layers in plans. A simple structure with standard zone and overlay names will enable WEL to easily identify the section of the plan relevant to its network utility infrastructure.

In particular, WEL supports the inclusion of a standardised designation overlay for all district plans. A standardised designation overlay will ensure that WEL can easily identify each of its designations on planning maps in the district plans within its network area.



## **Chapter Form**

WEL supports a standard form of plans and, in particular, supports the activity status of each rule being located within the heading of the rule (or in the rule row, when using a table format). Having a standard format for each plan will improve the consistency and user-friendliness.

## **Definitions**

WEL supports the inclusion of standardised definitions within plans. In particular, WEL supports the inclusion of a standard definition for Infrastructure, Network Utility, Notional Boundary, Earthworks, Telecommunication, Building, Utility/Utility Service, Line and Minor Upgrading.

In particular, WEL supports a definition of Minor Upgrading as currently the definitions of minor upgrading vary within district plans in its network area. WEL relies upon such definition for day-to-day activities in order to maintain and upgrade its network equipment.