

**NOTICE OF SUBMISSION TO PROPOSED PLAN CHANGE 33 (FLOOD HAZARDS) ON THE WANGANUI  
DISTRICT PLAN**

**To:** Wanganui District Council  
PO Box 637  
Wanganui  
  
Rachael.pull@wanganui.govt.nz

**Submitter:** Powerco Limited  
Private Bag 2061  
New Plymouth 4342

**Address for Service:** BURTON PLANNING CONSULTANTS LIMITED  
Level 1, 2-8 Northcroft Street  
PO Box 33-817, Takapuna,  
**AUCKLAND 0740**

Attention: Kathryn Akozu

Phone: (09) 917-4302

Fax: (09) 917-4311

Email: [kakozu@burtonconsultants.co.nz](mailto:kakozu@burtonconsultants.co.nz)

**A. INTRODUCTION**

1. Powerco Limited (*Powerco*) is New Zealand's second largest gas and electricity Distribution Company and has experience with energy distribution in New Zealand spanning more than a century. The Powerco network spreads across the upper and lower central North Island servicing over 400,000 consumers. This represents 46% of the gas connections and 16% of the electricity connections in New Zealand. Powerco supplies electricity to the whole of the Wanganui District.

**B. THE SPECIFIC PROVISIONS OF THE PROPOSED PLAN THAT POWERCO'S SUBMISSION RELATES TO ARE SUMMARISED AS FOLLOWS:**

1. This submission relates specifically to the following provisions of the Proposed Plan Change 33 (Flood Hazards) to the Wanganui District Plan (*the District Plan*).
  - Policies PX 1,2 and 5
  - Rule RX 1
  - Rule RX 3
  - Definition of "Critical Infrastructure"
  - Definition of "Upgrades"

**C. POWERCO WISHES TO BE HEARD IN SUPPORT OF THIS SUBMISSION**


**D. IF OTHERS MAKE A SIMILAR SUBMISSION, POWERCO WOULD BE PREPARED TO CONSIDER PRESENTING A JOINT CASE AT ANY HEARING.**

**E. POWERCO COULD NOT GAIN AN ADVANTAGE IN TRADE COMPETITION THROUGH THIS SUBMISSION.**

**F. POWERCO ARE DIRECTLY AFFECTED BY AN EFFECT OF THE SUBJECT MATTER OF THE SUBMISSION THAT—**

- (i) **ADVERSELY AFFECTS THE ENVIRONMENT; AND**
- (ii) **DOES NOT RELATE TO TRADE COMPETITION OR THE EFFECTS OF TRADE COMPETITION.**

Signed on and behalf of Powerco Limited



.....  
Kathryn Akozu  
Senior Planner

*Dated this day of 27<sup>th</sup> March 2014*



## SCHEDULE ONE: OBJECTIVES AND POLICIES

**A. The specific part of the District Plan that is the subject of this submission is:**

- Policy PX 1
- Policy PX 2
- Policy PX 5

**B. Reason for Submission:**

1. Powerco supports policies PX1 and PX 2 and seeks that they are retained in the Plan change without modification.
2. Powerco supports proposed Policy PX5 and seeks that it be retained in the Plan Change without modification. Policy PX5 is consistent with Policy 10-4 New Critical Infrastructure in the One Plan which is important for the management of critical infrastructure throughout the Manawatu-Wanganui region. It is noted that this policy only relates to the location of new critical infrastructure in hazard areas, and does not apply to existing critical infrastructure which is already established.

**A. Relief Sought:**

**1. Retain without modification Policy PX 1 as follows:**

***New buildings in flood prone areas***

*Avoid the erection of new buildings in areas of higher probability of floodwater inundation (Area A) where this may induce or accelerate the impacts of flooding on people and property.*

**2. Retain without modification Policy PX 2 as follows:**

***Reduce risk to existing buildings***

*Reduce the impacts of floodwater inundation in flood prone areas, by requiring that alterations or additions to existing buildings and structures adopt resilient building methods.*

**3. Retain without modification Policy PX 5 as follows:**

*Avoid the establishment of new critical infrastructure within a flood risk overlay unless there is satisfactory evidence to show that critical infrastructure;*

- a. Will not be adversely affected by a 1 in 200 year flood event*
- b. Will not cause any adverse effects on the environment in the event of a flood*
- c. Is unlikely to cause a significant increase in the scale or intensity in the event of a flood*
- d. Cannot be reasonably located in an alternative location.*

- 4. Adopt any other such relief, including additions, deletions or consequential amendments necessary to give effect to these submission as a result of the matters raised.**

## SCHEDULE TWO: PERFORMANCE STANDARDS

**A. The specific part of the District Plan that is the subject of this submission is:**

- Rule RX 1 - opposed
- New Rule
- Rule RX 3 - supported

**B. Reason for Submission:**

1. Powerco seeks to ensure that existing critical infrastructure within flood hazards can continue to be upgraded and that new and upgraded non-critical infrastructure is a permitted activity in the Flood Hazard Zones. Powerco considers that non-critical infrastructure such as electricity cables, poles and transformers are appropriate in flood hazard areas as such structures can be designed to withstand flood events and water damage. Powerco will endeavour to avoid locating above ground structures in flood hazard areas, but in some cases it may not be possible to avoid areas where the assets are required to supply an area with electricity.
2. Rule RX 1 does achieve this, however compliance with the performance standards in proposed Rule RX 5 would be required. These performance standards relate to building platforms and are not relevant for network utilities such as electricity poles, transformers and substations. Therefore Powerco requests that a separate rule is included in the Plan Change that provides for upgrading of existing critical infrastructure and new and upgraded non-critical infrastructure as a permitted activity and which is not subject to any performance standards.
3. Powerco supports new critical infrastructure being a discretionary activity in flood hazard areas and therefore Rule RX3 should be retained without modification.

---

**C. Relief Sought:**

**1. Amend Rule RX 1 to as follows:**

*The following are permitted activities (excluding sites within the Riverfront and Arts and Commerce zones) provided they comply with the performance standards:*

- a. Earthworks
- b. Building maintenance and minor works

- ~~c. Upgrades to critical infrastructure.~~
- ~~d. New or upgraded non-critical infrastructure~~

2. Include a new permitted activity rule for minor upgrades of critical infrastructure and as follows:

*The following are permitted activities:*

- a. Minor upgrades to critical infrastructure.
- b. New or minor upgrades of existing non-critical infrastructure

3. Retain without modification Rule RX 3 as follows:

*The following are discretionary activities:*

- a. *New critical infrastructure and works to critical infrastructure not provided for as Permitted or Restricted Discretionary Activities*
- b. *Earthworks that do not comply with performance standard RX5(2)*

4. Adopt any other such relief, including additions, deletions or consequential amendments necessary to give effect to these submission as a result of the matters raised.

### SCHEDULE THREE: DEFINITIONS

**A. The specific part of the District Plan that is subject of this submission is:**

- Definition of “Critical Infrastructure” - supported
- Definition of “Upgrades” – supported subject to minor amendment.

**B. Reason for Submission:**

1. Powerco supports the definition of “critical infrastructure” as it is consistent with the definition in the One Plan.
2. Powerco seeks that the definition of “upgrades” be amended to refer to “minor upgrading” this reference better reflects the activities that are undertaken in accordance with the definition. Powerco supports the proposed definition of minor upgrades as it is not an inclusive definition but provides guidance for the types of activities that can be considered “minor upgrades” in relation to network utilities.

**B. Relief Sought:**

**1. Retain without modification the definition of “critical infrastructure” as follows:**

***Critical infrastructure** - With regard to the provisions for Flood Area A and B, means infrastructure necessary to provide services which, if interrupted, would have a serious effect on the people within the Region or a wider population, and which would require immediate reinstatement. Critical infrastructure includes infrastructure for:*

*(a) electricity substations*

*(b) strategic road and rail networks*

*(c) telecommunications cabinets and cellular service infrastructure*

**2. Amend the definition of “upgrades” as follows:**

***Minor Upgradings** – With regard to the provisions for Flood Area A and B, means works to provide for an increase in carrying capacity, efficiency, or security of electricity and telecommunication facilities, utilising existing support structures or structures of a similar scale or character and includes:*

- (i) the addition of circuits and/or conductors;*
- (ii) the reconductoring of the line with higher capacity conductors;*
- (iii) the resagging of conductors;*
- (iv) the addition of longer more efficient insulators;*
- (v) the addition of earthwires (which may contain telecommunication lines, earthpeaks and lightning rods);*
- (vi) the replacement or alteration of an existing telecommunication antenna.*
- (vii) the widening of existing roads.*

*Minor upgrading does not include:*

- (i) an increase in the voltage of the line unless the line was originally constructed to operate at the higher voltage but has been operating at a reduced voltage*

- 3. Adopt any other such relief, including additions, deletions or consequential amendments necessary to give effect to these submission as a result of the matters raised.**