

## SUBMISSION BY POWERCO LIMITED ON THE PROPOSED LOWER HUTT DISTRICT PLAN

To: Policy Planning Team  
Hutt City Council  
Private Bag 31-912  
Lower Hutt 5040

Via email: [district.plan@huttcity.govt.nz](mailto:district.plan@huttcity.govt.nz)

Name of submitter: Powerco Limited  
Private Bag 2061  
New Plymouth 4340  
*(Note that this is not the address for service.)*

1. This is a submission by Powerco Limited (**Powerco**) on the Proposed Lower Hutt District Plan (**PDP**).
2. Powerco could not gain an advantage in trade competition through this submission.
3. The specific provisions of the PDP that the submission relates to, the submission points, reasons and decisions sought are detailed in **Appendix A**. Powerco seeks that the decisions sought as set out in the attached table are adopted, or any other such relief and/or consequential amendments that achieves an equivalent outcome.
4. In summary, this submission seeks to ensure recognition, protection and continued operation of Powerco's gas distribution network within Hutt City.
5. Powerco wishes to be heard in support of this submission.
6. If others make a similar submission, Powerco would be prepared to consider presenting a joint case at any hearing.

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



**Gary Scholfield**  
Senior Environmental Planner  
**POWERCO**

Dated at Tauranga this 2<sup>nd</sup> day of May 2025.

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## About Powerco

Powerco is an electricity and gas distribution company providing essential infrastructure to diverse communities across the North Island of Aotearoa. Powerco keeps the lights on and gas flowing to around 1.1 million customers, across 452,000 homes, businesses, and organisations in the North Island. We operate more than 28,000km of electricity lines and cables, and over 6,170km of gas pipelines. This represents 46% of the gas connections and 16% of the electricity connections in New Zealand.

A reliable and constant energy supply is critical to sustaining the economy, communities, and our way of life. Demand for energy is constantly increasing. Powerco faces an increasing number of constraints on its ability to provide secure and reliable energy supplies to meet increasing demand resulting from both population growth and the transition to a low carbon economy.

Powerco owns and operates the gas distribution network within Lower Hutt as shown in **Appendix B**. The distribution network needs to be operated, maintained, repaired, replaced, and upgraded to maintain or improve capacity or security of supply; regardless of where those assets may exist.

Powerco's gas assets include a network of underground gas distribution pipelines and associated infrastructure (which may be aboveground, belowground or have components of both) throughout Lower Hutt. The gas distribution network comprises distribution main pipelines (normally steel pipes) that transport gas from 'Delivery Points' to Regulator stations; service mains linking regulator stations or supplying large customers; ancillary equipment such as valves and pressure reducing stations; and service pipelines (normally PE pipes) which deliver gas to the customer, ending at the meter control valve at a customer's point of connection.

## Appendix A - Powerco submission points on the Proposed Lower Hutt District Plan

Specific provision / matter	Submitter Position	Reason for Submission	Requested decision (additions underlined and deletions strikethrough)
Definition – Cabinet	Support	Powerco supports the inclusion of gas distribution enclosures in this definition and the clarity which it provides.	Retain as drafted.
Definition - infrastructure	Support with amendment	Powerco supports the definition as it includes reference to gas distribution. Powerco seeks a slight amendment to the definition to include reference to biogas. Powerco is investigating the use of biogas in its gas distribution networks in a process to decarbonise and create a sustainable alternative to natural gas.	Retain clause (a) with amendment:  a. pipelines that distribute or transmit natural or manufactured gas, petroleum, biofuel, <b>biogas</b> , or geothermal energy:
Definition - network utility operator	Support with amendment	Powerco supports the definition as it includes reference to gas distribution. Powerco seeks a slight amendment to the definition to include reference to biogas. Powerco is investigating the use of biogas in its gas distribution networks in a process to decarbonise and create a sustainable alternative to natural gas.	Retain clause (a) with amendment:  a. undertakes or proposes to undertake the distribution or transmission by pipeline of natural or manufactured gas, petroleum, biofuel, <b>biogas</b> , or geothermal energy; or
Definition – Operational Need	Support	Powerco supports this national planning standards definition.	Retain as drafted.

<b>Specific provision / matter</b>	<b>Submitter Position</b>	<b>Reason for Submission</b>	<b>Requested decision (additions underlined and deletions strikethrough)</b>
Definition - Regionally Significant Infrastructure	Support	Powerco supports the alignment of this definition with the Wellington RPS and the clarity it provides.	Retain as drafted.
Definition – Upgrading	Support	Powerco supports this definition and the clarity which it provides.	Retain as drafted.
Strategic Direction INFSD-O3	Support	Powerco supports this objective and the clarity which it provides.	Retain as drafted.
Infrastructure INF-O1	Support	Powerco supports this objective and the clarity which it provides.	Retain as drafted.
INF-O2	Support	Powerco supports this objective and the clarity which it provides.	Retain as drafted.
INF-P1	Support	Powerco supports this policy and the clarity which it provides.	Retain as drafted.
INF-P2	Support	Powerco supports this policy and the clarity which it provides.	Retain as drafted.
INF-P3	Support	Powerco supports this policy and the clarity which it provides.	Retain as drafted.
INF-P4	Support	Powerco supports this policy and the clarity which it provides.	Retain as drafted.
INF-P5	Support	Powerco supports this policy and the clarity which it provides.	Retain as drafted.

Specific provision / matter	Submitter Position	Reason for Submission	Requested decision (additions underlined and deletions strikethrough)
INF-P6	Oppose	<p>The requirement for undergrounding of new networks needs to consider the configuration of existing networks in the area. It is not always practicable or economically viable to underground infrastructure, particularly where existing infrastructure is overhead.</p> <p>Powerco is concerned that the use of 'adverse effects' is unduly restrictive, as it could have wide application. Any activity, including permitted activities, could potentially generate adverse effects. Powerco considers that the term adverse effects needs qualification as to the significance of the effect.</p>	<p>Amend INF-P6 as follows:</p> <p>2. Recognising that co-location of infrastructure, shared use of infrastructure corridors and undergrounding of infrastructure <u>may, where practicable,</u> provide opportunities for avoiding and minimising adverse effects,</p> <p>3. Where <u>significant</u> adverse effects cannot be avoided due to the functional needs and operational needs of the infrastructure to be in that location, then the extent to which those adverse effects are minimised by the infrastructure design or operation,</p>
INF-P7	Support	Powerco supports this policy and the clarity which it provides.	Retain as drafted.
INF-P9	Support	Powerco supports this policy and the clarity which it provides.	Retain as drafted.
INF-P10	Support	Powerco supports this policy and the clarity which it provides.	Retain as drafted.
INF-P11	Support	Powerco supports this policy and the clarity which it provides.	Retain as drafted.
INF-P12	Support	Powerco supports this policy and the clarity which it provides.	Retain as drafted.

Specific provision / matter	Submitter Position	Reason for Submission	Requested decision (additions underlined and deletions strikethrough)
INF-P13	Support	Powerco supports this policy and the clarity which it provides.	Retain as drafted.
INF-P14	Oppose	<p>Powerco gas infrastructure, particularly customer connections, already exist within the Active Street Frontage Overlay areas. The blanket requirement to adopt the urban design outcomes for the zone or precinct can be very problematic for network utilities, particularly as it requires a subjective assessment to be undertaken.</p> <p>It is noted that the building standards for Active Frontages (e.g. MCZ-S4) requires buildings to be built to the full width of the Active Street Frontage Overlay, which doesn't leave a secondary façade that gas customer connections can be mounted on (i.e. it has to be mounted on the building frontage).</p> <p>Given the other provisions contained within INF-P14, it is considered that sub-clause 4 should be deleted.</p>	<p>Amend INF-P14 as follows:</p> <p><del>4 It is consistent with the urban design outcomes for the zone or precinct in which it is located.</del></p>
Chapeau at the start of Rules Table	Support	Powerco supports the clarity the chapeau provides with respect to the	Retain as drafted.

Specific provision / matter	Submitter Position	Reason for Submission	Requested decision (additions underlined and deletions strikethrough)
		application of rules applicable to infrastructure throughout the PDP.	
Format of rules table	Oppose	The current rules table in the eplan is inefficient and difficult to navigate, particularly as the header row moves as your scroll down the rule table. The rules table should be formatted so that each zone is clearly identified in the rule.	Amend the formatting of the rules table so that each zone is clearly identified in the rule. For example, INF-S4 addresses cabinets in various different zones in a clear manner. Another example is the Network Utility Chapter of the Proposed New Plymouth District Plan.
INF-R2	Support	Powerco supports this rule as existing network utilities need to be operated, maintained, replaced and removed as required.	Retain as drafted.
INF-R3	Oppose	Powerco is concerned the current wording could be interpreted as applying to gas distribution networks. The wording should be altered to ensure it only excludes to gas transmission and electricity transmission.	Amend INF-R3 as follows:  Upgrading of infrastructure, excluding transport network infrastructure, <del>and gas and</del> transmission <u>pipelines and electricity transmission lines</u> over 110kV.
INF-R4	Support	Powerco supports this rule and the clarity which it provides.	Retain as drafted.
INF-R5	Support	Powerco supports this rule and the clarity which it provides.	Retain as drafted.



Specific provision / matter	Submitter Position	Reason for Submission	Requested decision (additions underlined and deletions strikethrough)
INF-R7	Oppose	As outlined in the submission point for INF-P14, Powerco already has gas infrastructure located within the Active Street Frontage Overlay areas. Powerco seeks a permitted activity status for cabinets in the Active Street Frontage Overlay, subject to standards – see also the Powerco submission point on INF-S4 below.	Amend INF-R7 so that the activity status for New cabinets (not regulated by the NESTF) in the Active Street Frontage Zone is permitted: <del>RDIS</del> <u>PER</u>
INF-R8	Support	Powerco supports this rule and the clarity which it provides.	Retain as drafted.
INF-R9	Support	Powerco supports this rule and the clarity which it provides.	Retain as drafted.
INF-R10	Support	Powerco supports this rule and the clarity which it provides.	Retain as drafted.
INF-R25	Support	Powerco supports this rule and the clarity which it provides.	Retain as drafted.
INF Chapter Assessment matters for Restricted Discretionary Activities	Support	Powerco supports the assessment matters for Restricted Discretionary activities and the clarity it provides.	Retain as drafted.
INF-S2	Support	Powerco supports this standard – the requirements applying to upgrading of infrastructure are appropriate.	Retain as drafted.

Specific provision / matter	Submitter Position	Reason for Submission	Requested decision (additions underlined and deletions strikethrough)
INF-S3	Support	Powerco supports this standard - the requirements applying to underground infrastructure are appropriate.	Retain as drafted.
INF-S4	Oppose	<p>Powerco seeks the addition of standards applicable to cabinets within the Active Street Frontage Overlay. Powerco considers that cabinets up to 1m<sup>2</sup> and 1.5m high should have a permitted activity status.</p> <p>In respect of the matters of discretion, Powerco considers that point 2, <i>the attractiveness of active transport environments</i>, is very subjective. This standard only applies to cabinets located within the road or rail corridor. This assessment criteria has the potential to conflict with the general right Powerco has to locate equipment within road corridors under the Gas Act 1992.</p> <p>Deletion of point 2 will not preclude consideration of effects on the environment as the matters covered in point 3 can address potential impacts on the transport environment.</p>	<p>Amend INF-S4 as follows:</p> <p><b><u>Active Street Frontage Overlay</u></b></p> <ol style="list-style-type: none"> <li><b><u>The cabinet must not exceed a maximum height above ground level of 1.5m.</u></b></li> <li><b><u>The cabinet must not exceed a maximum area of 1m<sup>2</sup></u></b></li> </ol> <p>Matters of discretion if the standard is breached:</p> <ol style="list-style-type: none"> <li><del><b>Adverse effects on the attractiveness of active transport environments.</b></del></li> <li><b><u>Where practicable</u></b> measures to mitigate the bulk and scale of the structure including screening, colour and finish treatment, landscape screening, viewing distances, and the location of support structures.</li> </ol>

Specific provision / matter	Submitter Position	Reason for Submission	Requested decision (additions underlined and deletions strikethrough)
		In respect of the 4 <sup>th</sup> matter of discretion, utilities have operational requirements that can potentially be impacted by mitigation measures. For example, landscape screening may prevent a network utility from being able to function as it is designed. As such point 4 needs to be qualified to recognise that some mitigation measures may be inappropriate.	
INF-S5	Support	Powerco supports this standard – the requirements applying to cabinets not located within road reserve or the rail corridor are appropriate.	Retain as drafted.
INF-S11	Support	Powerco supports this standard- the duration stated for temporary infrastructure and requirement of removal is appropriate.	Retain as drafted.
INF-S14	Support	Powerco supports this standard – the standards for buildings and structures are appropriate.	Retain as drafted.
Table 1: Street trees specifications  Horizontal setback distances from	Oppose	Powerco is concerned that the minimum horizontal setback distances are inadequate to reasonably protect underground services from tree-root damage and will also increase costs	Amend Table 1: Street trees specifications as follows:  Horizontal setback distances from underground infrastructure (m)  <600mm: <del>0.50</del> <b><u>1.5</u></b>

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underground infrastructure (m)		associated with installing or accessing underground assets.	600+mm: 1-5 <u>3</u>
INF-S16	Oppose	Corridor managers often require Network utilities located within the road to be situated close to the property boundary. This means that earthworks will be undertaken by Network Utility operators within 1m of site boundaries on a regular basis. These types of minor works should not require a resource consent.	Amend INF-S16.3 as follows:  3. Earthworks must not be located within 1.0m of the site boundary, measured on a horizontal plane except where the site boundary separates adjoining sites which are both within the area of land subject to the proposed works, <b><u>or where earthworks are within the road corridor.</u></b>
INF-S17	Support	Powerco supports this standard – the earthworks requirements for the specified zones are appropriate.	Retain as drafted.
INF-S18	Support	Powerco supports this standard- it is appropriate that earthworks / vegetation removal areas are reinstated as soon as practicable.	Retain as drafted.
INF-S19	Oppose	Powerco generally supports this standard, however an exception needs to be made for earthworks undertaken within formed roads. Some of the SASM areas are quite large and cover significant assets.	Amend INF-S19 as follows:  2. The earthworks must be located directly above existing underground infrastructure, <b><u>except where the earthworks are undertaken within formed roads.</u></b>

Specific provision / matter	Submitter Position	Reason for Submission	Requested decision (additions underlined and deletions strikethrough)
PINF-O1	Support	Powerco supports this objective and the clarity which it provides.	Retain as drafted.
PINF-P1	Support	Powerco supports this policy and the clarity which it provides.	Retain as drafted.
PINF-R2	Oppose	This rule applies to all buildings and structures within 15m of a gas transmission pipeline or transmission station. Powerco takes supply from First Gas and has an aboveground station at Belmont. Powerco seeks to ensure that we are not unduly restrained on our site.	Amend PINF-R2 as follows:  1. Activity status: Restricted discretionary  Where:  Located within the Gas Transmission Pipeline Corridor, <u>excluding gas distribution buildings and structures.</u>
HH-R2	Oppose	Powerco is concerned that this rule applies solely to customer connection lines related to telecommunications and does not encompass gas distribution pipelines. As gas distribution pipelines are not currently defined as customer connection line, the scope of the rule should be expanded to include gas connections as well.	Amend HH-R2(1)(a)(ii) as follows:  ii. The alteration is:  1. For a customer connection <u>or gas connection</u> that does not involve the alteration of the street-facing elevation of the building or structure, or  2. To remove a customer connection or <u>gas connection</u> from the building or structure provided that maintenance and repair is undertaken to the part of the building or structure where the customer <u>or gas</u> connection was removed.
HH-R7	Support	Powerco supports this rule and the clarity which it provides.	Retain as drafted.

Specific provision / matter	Submitter Position	Reason for Submission	Requested decision (additions underlined and deletions strikethrough)
TREE-R3	Oppose	Powerco is concerned at the restriction being placed on activities within the root protection area and driplines of notable trees, particularly where these are located within the road corridor. Powerco considers that with arborist oversight and appropriate excavation or installation techniques, underground services can be installed without adversely affecting the health of the tree.	Amend TREE-R3(1)(c) as follows:  c. The activity does not involve the construction or addition of a structure, <b><u>excluding underground pipelines where the works are supervised by supervised by an arborist and any excavation is undertaken by hand-digging, air or hydro excavation or installed by directional drilling, and.</u></b>
ECO-R2	Oppose	While Powerco does not undertake a lot of vegetation clearance associated with its gas distribution networks, residential zoning within the PDP is extensive and this zoning applies to legal road where Powerco installs the majority of its network. On this basis, Powerco considers that an allowance needs to be made for indigenous vegetation clearance within residential zones associated with the establishment of new infrastructure.	Amend ECO-R2.2 as follows:  vii. To <b><u>establish</u></b> , maintain, operate, repair or decommission existing infrastructure, or
SUB-P9	Support	Powerco supports this policy and the clarity which it provides.	Retain as drafted.

Specific provision / matter	Submitter Position	Reason for Submission	Requested decision (additions underlined and deletions strikethrough)
SUB-R5	Support	Powerco supports subdivision being a controlled activity for infrastructure.	Retain as drafted.

## Appendix B - Maps of Powerco Gas Distribution Networks within Lower Hutt





