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Tēnā koē,

## **Proposed District Plan - Submission**

Clarus welcomes the opportunity to comment on the Te Awa Kairangi ki Tai Lower Hutt Proposed District Plan. Our submission is attached to this cover letter as Appendix 1, with this letter providing an overview of Clarus entities, and the specific interest Clarus has in the District through the Firstgas Transmission pipeline.

### **Introduction to Clarus**

Clarus is one of New Zealand's largest energy groups. Whether it's transmission, distribution, supply or storage of energy, the companies within the Clarus group service over half a million homes and businesses of all sizes around New Zealand.

Firstgas connects over 300,000 homes and businesses with natural gas through its gas distribution and high-pressure transmission network. This essential infrastructure supports New Zealand's economy, so the group is committed to helping customers maximise value from it.

Flexgas provides energy storage services at the underground Ahuroa Gas Storage Facility. This sort of storage can offer an important source of flexibility to the electricity system at periods of peak demand, supporting security of electricity supply as New Zealand moves to higher levels of intermittent wind and solar generation.

Rockgas is New Zealand's largest LPG retail supplier, providing fast and reliable service through a national network of branches and franchises.

Firstlight Network is the lines company supplying electricity to the Tairāwhiti and Wairoa region, responsible for keeping the lights on across 12,000 square kilometres of the East Coast.

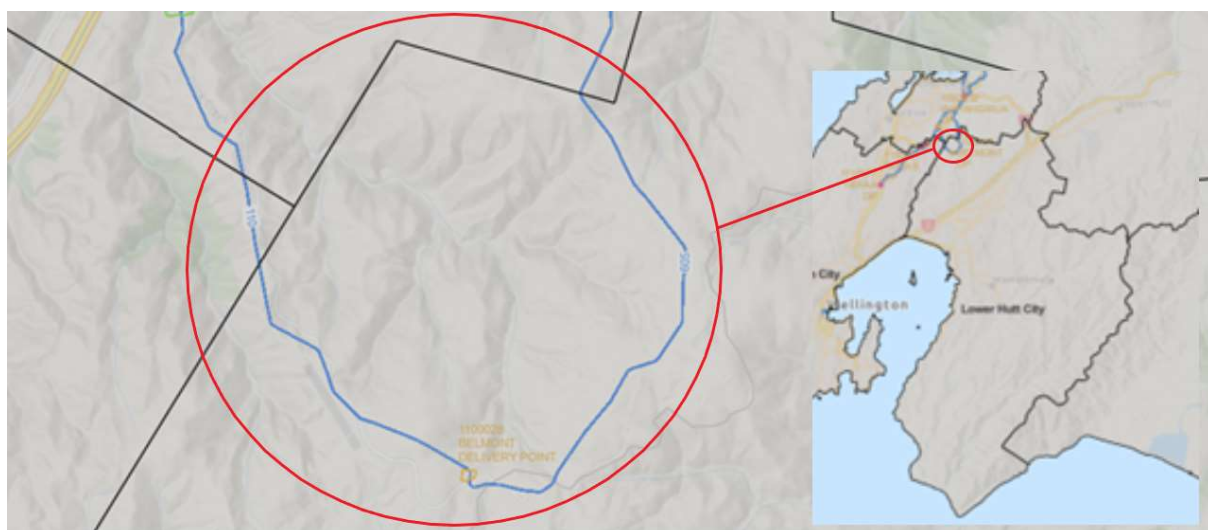


We are investing in innovative renewable gas technologies such as biogas upgrading and hydrogen blending equipment. These technologies have the potential to play a part in the transition to a lower emissions energy system.

At Clarus, our First Renewables business is leading our work programme looking at the potential for renewable energy developments. We aim to open the door for Aotearoa New Zealand homes, businesses and energy intensive industries to access lower emissions gas and renewable energy options now and in the future.

### **Specific Interest in the Te Awa Kairangi ki Tai Lower Hutt District (the District)**

The Firstgas transmission pipelines occupy only a small area to the northwest of the District. The 110 and 605 Transmission pipelines, and the associated Belmont Delivery Point (DP) station, are located within Belmont Park, see image below.



**Figure 1:** Location of Transmission pipes within Lower Hutt City District. Source Firstgas GiS

The location of all Firstgas pipelines and stations is visible within our geospatial data, available for download via <https://data-firstgas.hub.arcgis.com/>

### **Submission**

The vision of Clarus is to “*deliver good energy for a brighter Aotearoa*”. We are taking action to deliver safe, reliable and cleaner energy now and for the future. As part of this action, our submission seeks to protect the existing infrastructure located within the District and ensure the District Plan provides for renewable energy development that may arise in the future.

We thank the Council for consideration of our submission and welcome the opportunity to discuss the submission further, should Council have any queries. We would take the opportunity to speak to our submission at the hearings process.



Neither myself or Clarus could gain an advantage in trade competition through this submission.

Ngā mihi nui

Pamela Unkovich  
Senior Planner

**Clarus**



## Appendix 1 - Submission



Align

 **Clarus**

Lower Hutt Proposed  
District Plan Submission

1 May 2025

Bringing places and  
communities to life.

## QUALITY CONTROL SHEET

Proposal:	Lower Hutt Proposed District Plan 2025
Client:	Clarus
Review by:	Jo Michalakakis

### Version:

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### Produced by:

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  Bernie Warmington	  Jo Michalakakis
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*Cover Image credit: First Renewables – Biogas Upgrade Facility, Reporoa*

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## 1. Overview of submission

Summary comments on the Proposed District Plan are provided here, as background to the specific relief sought which is described in Section 2.

### 1.1. Definitions

The definitions are supported overall, in particular the following definitions which help to identify significant infrastructure, activities which are sensitive to location near such infrastructure and suitable separation or mitigation measures:

- Activity sensitive to gas transmission infrastructure
- Gas transmission pipeline
- Gas transmission pipeline corridor
- Regionally significant infrastructure
- Reverse sensitivity – although this definition seems somewhat complex
- Significant hazardous facility

Changes to some definitions have been requested.

### 1.2. INF – Infrastructure

The Infrastructure chapter is supported overall, subject to some specific requests.

### 1.3. PINF – Protection of Infrastructure

The Protection of Infrastructure chapter is supported overall, subject to some specific requests. In particular, RDIS rather than DIS is considered an appropriate activity status for new pipelines outside the sensitive overlays (landscape and natural character).

### 1.4. REG - Renewable Electricity Generation

The chapter is supported overall, subject to some specific requests. While renewable electricity is the subject of the National Policy Statement – Renewable Electricity Generation, there are other forms of renewable and low-carbon energy that should be equally provided for. These may arise from (e.g.) landfill gas capture, biowaste digestion, wastewater treatment plant capture or importation. This approach would be more consistent with the policy direction of the Wellington RPS and RPS Plan Change 1 (Decisions Version), which does not limit the direction to renewable electricity only.

### 1.5. CL – Contaminated Land

The approach is supported.

### 1.6. HS – Hazardous Substances

The approach is supported.

### 1.7. ECO - Ecosystems and Indigenous Biodiversity

The approach to indigenous vegetation removal is supported.

### 1.8. SUB - Subdivision

The approach to subdivision in the gas transmission corridor is supported with minor requests.

### 1.9. EW – Earthworks

The approach to earthworks in the gas transmission corridor is supported with minor requests.

### 1.10. GIZ - General Industrial Zone

The approach is supported.

### 1.11. HIZ - Heavy Industrial Zone

The approach is supported.

### 1.12. NOSZ - Natural Open Space Zone

Additional text is sought to recognise that the zone already includes infrastructure which necessarily must traverse it in order to provide essential services to residents and businesses. These activities should be recognised, while managing adverse effects as far as possible.

### 1.13. Designation WRC-12 Belmont Regional Park

The need for a designation over this area to provide for the activities stated is not very clear. If the NOR is to be confirmed its extent and conditions should reflect the fact that the Regional Park already includes infrastructure which must traverse it in order to provide essential services to residents and businesses. These activities should be recognised, while managing adverse effects as far as possible. Adverse effects on the infrastructure by regional park operational activities should also be appropriately managed. If a designation were to be confirmed the Proposed District Plan rules for such activities would be superseded by the designation's permitted activity conditions or an outline plan.

The NOR states that "No additional site development is proposed at the park as a particular result of the designation. However, site development may be undertaken in the future in accordance with the purpose of the designation and as provided for in the reserves management plan." This is quite open-ended in terms of the likely activities, particularly if these involve publicly accessible buildings or significant earthworks.

Our preferred relief is that the gas transmission pipeline corridor is excluded from the proposed designation boundary.

Another possible approach is to recognise within the conditions the need for regionally significant infrastructure to operate and develop within the Regional Park. In addition, earthworks and buildings / structures near the transmission pipeline could be excluded from the NOR and considered under the Proposed District Plan provisions. As currently stated in the NOR earthworks up to 1,000m<sup>2</sup> and 2m depth would be exempt from the requirement for an Outline Plan or any other controls.

## 2. Decisions requested

The decisions requested and the reasons for these are summarised in Table 1. This is based on the format proposed in the Proposed District Plan 'Have Your Say' guidance:

- Point number
- Chapter
- Provision
- Position
- Reasons
- Relief Sought

Table 1: Decisions sought by Clarus

#	Chapter	Provision	Position	Reasons	Relief Sought
Part 1 – Introduction and General Provisions INTERPRETATION					
1	Definitions	Activity sensitive to gas transmission infrastructure	Support	This is a helpful way to identify activities which generally should not be located close to gas infrastructure	Retain
2	Definitions	Cabinet	Support	The Operative Plan definition did not include gas distribution enclosures. This definition includes gas distribution enclosures, which are a low impact structure similar to telecommunication and electricity cabinet structures.	Retain
3	Definitions	Existing activity ( <i>means, in relation to a site, an activity that has been taking place on that site since 6 February 2025, with no interruption of greater than 12 months.</i> )	Neutral	It is unclear why a specific definition is required which may override s10 RMA and case law, although it is largely consistent with s10.	Clarify how this definition relates to s10 RMA and whether it is necessary.

#	Chapter	Provision	Position	Reasons	Relief Sought
4	Definitions	Gas transmission pipeline	Support	Support defining the transmission pipeline so that it can be appropriately managed	Retain
5	Definitions	Gas transmission pipeline corridor	Support	Support defining the transmission pipeline corridor so that it can be appropriately managed	Retain
6	Definitions	Regionally significant infrastructure	Support	Support defining regionally significant infrastructure so that it can be appropriately managed	Retain
7	Definitions	Reverse sensitivity	Oppose in part	<p>This definition is complex and may be unworkable. The apparent intent of the definition is supported, to clarify that existing lawful activities and those with a functional and operational need to be where they are should not be unnecessarily constrained by activities which establish later. The definition should be replaced by a more general definition which can be interpreted in relation to case law (which may evolve) and individual circumstances.</p> <p>We note that this term appears in objectives, policies and rules in many chapters including PINF, HS, SUB and most or all zone</p>	<p>Include a simpler definition such as that in the Queenstown Lakes Proposed District Plan:</p> <p><u>...means the potential for the operation of an existing lawfully established activity to be constrained or curtailed by the more recent establishment or intensification of other activities which are sensitive to the established activity.</u></p>

#	Chapter	Provision	Position	Reasons	Relief Sought
				chapters, so it will have a widespread effect.	
8	Definitions	Sensitive activities	Support	This is a helpful way to identify activities which generally should not be located close to major infrastructure	Retain
9	Definitions	Significant hazardous facility	Support	It is important to identify significant hazardous facilities so that these can benefit from the protection of (e.g.) Objective HS02 and Policy HSP3 which discourage the establishment of sensitive activities near Significant Hazardous Facilities.	Retain
10	Definitions	Upgrading	Support	This definition is supported. We note that 'minor upgrading' has not been carried over from the Operative District Plan. Instead the definition of upgrading in Standard INF-S2 provides quantitative measures of what upgrading falls within the permitted rules.	Retain
Part 2 District Wide Matters STRATEGIC DIRECTION					
11	SD – Strategic Direction	INFSD-O3 National and Regional Significance	Support in part	This is an important statement that strategically significant infrastructure needs to be	Retain and add:

#	Chapter	Provision	Position	Reasons	Relief Sought
				supported and protected. We understand that this would apply to both existing and planned / future infrastructure. It may be desirable to add some words to clarify this.	<u>..., including extensions of existing and establishment of new infrastructure of national and regional significance.</u>
ENERGY, INFRASTRUCTURE AND TRANSPORT					
12	INF - Infrastructure	Whole chapter	Support in part	Support the overall direction of the chapter subject to specific requests below. To the extent that any changes are proposed to the chapter during the reporting and hearings process Clarus may seek to respond to these at the time.	Retain the chapter as notified, subject to making the changes proposed in this submission.
13	INF - Infrastructure	Objective INF-O1 – Benefits of Infrastructure	Support	Clarus agrees with this objective	Retain
14	INF – Infrastructure	Objective INF-O2 – Adverse Effects of Infrastructure	Support	Clarus agrees with this objective	Retain
15	INF – Infrastructure	Objective INF-O3 – Infrastructure Availability and Capacity	Support	Clarus agrees with this objective	Retain
16	INF – Infrastructure	Policy INF-P1 – Recognizing Benefits of Infrastructure	Support in part	Clarus agrees with this policy. Point 7 refers only to electricity, it	Add to point 7:

#	Chapter	Provision	Position	Reasons	Relief Sought
				should be extended to all forms of energy	7. Enabling the safe and efficient transmission of electricity, <u>gas and liquid fuels</u> .
17	INF – Infrastructure	Policy INF-P2 – Providing for Infrastructure	Support	Clarus agrees with this policy	Retain
18	INF – Infrastructure	Policy INF-P3 – Planning and Delivery of Infrastructure	Support	Clarus agrees with this policy	Retain
19	INF – Infrastructure	Policy INF-P4 – Technological Advances	Support in part	Point 3 refers only to renewable electricity, it should be extended to all forms of renewable energy	Add to point 3: 3. Facilitate a transition to renewable electricity <u>and other renewable energy sources</u>
20	INF – Infrastructure	Policy INF-P5 – Adverse Effects of Infrastructure	Support	This policy is appropriate, in particular the phrase 'as far as practicable' as it recognises the reality that the options for location and design of infrastructure, particularly linear infrastructure, may be limited.	Retain
21	INF – Infrastructure	Policy INF-P6 – Consideration of the Adverse Effects of Infrastructure	Support	This policy is appropriate, in particular assessment matter 3: 'Where adverse effects cannot be avoided due to the functional and operational needs of the infrastructure to be in that location'	Retain

#	Chapter	Provision	Position	Reasons	Relief Sought
				which recognises the practical constraints on avoidance of effects	
22	INF – Infrastructure	Policy INF-P9 – Upgrading and developing infrastructure in natural hazard overlays	Support	The Proposed District Plan includes extensive natural hazard overlays. It is not possible for infrastructure to avoid these in all cases. It is important that this policy enables establishment or upgrading where there is a functional and operational need and risks are well managed.	Retain
23	INF – Infrastructure	Rule INF-R2 Operation, maintenance, repair and decommissioning of infrastructure	Support	Clarus agrees with this rule and that these activities can be permitted when they comply with standards	Retain
24	INF – Infrastructure	Rule INF-R3 Upgrading of infrastructure, excluding ... gas and transmission pipelines over 110kV	Neutral	<p>This rule description is confusing. We assume it is intended to refer to ‘gas <del>and</del> transmission pipelines and electrical transmission lines over 110kV’.</p> <p>We also note that standard INF-S2, which the rule names ‘<b>INF-S2 upgrading of underground infrastructure</b>’, addresses upgrading of [all] infrastructure, not upgrading of underground infrastructure only.</p>	<p>Please clarify the rule by including in the name:  <u>‘gas transmission pipelines and electrical transmission lines over 110kV’.</u></p> <p>Please correct the name of INF-S2.</p> <p>Clarus accepts that this rule excludes gas &gt;2000kPa which is covered under Rule INF-R15</p>
25	INF – Infrastructure	Rule INF-R9 New underground pipelines,	Support	Clarus agrees with this rule, including PER status generally	Retain

#	Chapter	Provision	Position	Reasons	Relief Sought
		including electricity and gas distribution and three waters, excluding electricity and gas transmission		outside the landscape and natural character area overlays, and RDIS where standards are not complied with.	
26	INF – Infrastructure	Rule INF-R15 Upgrading of gas transmission pipelines	Support in part	<p>Clarus agrees that upgrades should be generally PER activity status outside the identified overlays, in compliance with standards. Clarus consider that the effects of upgrading an underground pipeline are largely temporary, such that they can also be PER in the overlays, subject to standards. The proposed plan currently states that upgrading is RDIS or DIS where standards are complied with and DIS or NC when standards are not complied with.</p> <p>Clarus opposes NC activity status for pipelines in general, because there are often very limited options for where they can be located (i.e. functional and operational need). It is noted that in this case the overlays (ONF, ONL or OCNCA) where NC status is proposed are not near any current pipelines.</p>	Upgrades of pipelines to be PER in all locations including overlays, subject to compliance with standards

#	Chapter	Provision	Position	Reasons	Relief Sought
27	INF – Infrastructure	Rule INF-R15 Upgrading of gas transmission pipelines	Support in part	<p>The chapter is somewhat silent about the upgrading of above-ground gas network structures (not pipelines themselves) and what such activities would be permitted or otherwise.</p> <p>The definition of upgrading is:</p> <p><i>as it applies to infrastructure, means the improvement, relocation, replacement, or increase in carrying capacity, operational efficiency, size, pressure, security or safety of existing infrastructure, but excludes maintenance and repair.</i></p> <p>In the case of gas transmission pipelines upgrading can include activities such as additional or replacement valves and other structures. There may also be minor works to other above-ground structures and buildings.</p>	<p>Change the rule name to:</p> <p><b><u>Upgrading of gas transmission pipelines, including ancillary equipment, structures and buildings</u></b></p> <p>Add Standard INF-S14 to the list of standards for this rule</p> <p>Add the following definition of ‘upgrading’ in the context of gas transmission pipelines, either in the Interpretation chapter, as a footnote to Rule INF-R15 or as a new INF standard:</p> <p><u>Within the gas transmission pipeline corridor:</u></p> <ul style="list-style-type: none"> <li>• <u>Addition of ancillary equipment and structures which support the operation of the existing pipeline (e.g. pumps and filters), or their replacement with similar equipment, which has a plan area of no more than 20m<sup>2</sup></u></li> <li>• <u>Minor alterations and additions to above ground structures and buildings associated with an existing gas transmission pipeline, which have a plan area no more than 20m<sup>2</sup>.</u></li> </ul>

#	Chapter	Provision	Position	Reasons	Relief Sought
28	INF – Infrastructure	Rule INF-R16 New gas transmission pipelines	Oppose	<p>Clarus does not agree that new transmission pipelines should be NC in the High Natural Hazard Overlay.</p> <p>Clarus opposes NC activity status for pipelines in general, because there are often very limited options for where they can be located (i.e. functional and operational need) and there is potential for conflict with objectives and policies.</p> <p>The High Coastal Inundation Hazard overlay includes all of the coast of the District, which would make it very difficult to consent a new transmission pipeline in a marine location. The High Flood Hazard Overlay includes large parts of Seaview, Petone and Lower Hutt. NC status creates a presumption against an activity establishing, we do not think this is justifiable in view of the limited risks flooding poses to gas infrastructure.</p> <p>Clarus considers that RDIS is an appropriate activity status for new pipelines outside the sensitive overlays (landscape and natural character).</p>	<p>Change activity status as follows:</p> <ul style="list-style-type: none"> <li>• RDIS - Where no other columns in the table apply</li> <li>• DIS - High Natural Hazard Overlay</li> </ul> <p>Include text for matters of discretion:  <u>Matters of discretion are limited to the following effects, including measures for their avoidance, remedy or mitigation:</u></p> <ul style="list-style-type: none"> <li>• <u>Visual effects</u></li> <li>• <u>Effects of earthworks including sediment runoff, dust and visual effects</u></li> <li>• <u>Effects on health and safety</u></li> <li>• <u>Natural hazard effects– coastal hazards, flood hazards, land stability and earthquake</u></li> <li>• <u>Ecological effects</u></li> <li>• <u>Effects on vehicular access and public access</u></li> </ul>

#	Chapter	Provision	Position	Reasons	Relief Sought
29	INF – Infrastructure	INF-R25 Infrastructure not otherwise provided for or subject to any other rule in chapter	Support	Clarus agrees with this rule, including PER status where standards are complied with, where no other columns apply, and RDIS where standards are not complied with, outside the landscape and natural character overlays.	Retain
30	INF – Infrastructure	Standard INF-S2 Upgrading of infrastructure	Support	These standards provide certainty for operators	Retain
31	INF – Infrastructure	Standard INF-S3 Underground infrastructure	Support	These standards provide certainty for operators	Retain
32	INF – Infrastructure	Standard INF-S16 Earthworks – Slope, height, depth, and location	Support	These standards provide certainty for operators	Retain
33	INF – Infrastructure	Standard INF-S5 Cabinets not located within road reserve or the rail corridor	Support	These standards provide certainty for operators	Retain
34	INF – Infrastructure	Standard INF-S6 Height – Support structures not regulated by the NESTF	Support	These standards provide certainty for operators	Retain
35	INF – Infrastructure	Standard INF-S7 Size – Support structures not regulated by the NESTF	Support	These standards provide certainty for operators	Retain

#	Chapter	Provision	Position	Reasons	Relief Sought
36	INF – Infrastructure	Standard INF-S8 Location – Support structures	Support	These standards provide certainty for operators	Retain
37	INF – Infrastructure	Standard INF-S14 Buildings and structures, other than cabinets or support structures	Support	These standards provide certainty for operators	Retain
38	INF – Infrastructure	Standard INF-S16 Earthworks – Slope, height, depth, and location	Support	These standards provide certainty for operators	Retain
39	INF – Infrastructure	Standard INF-S17 Earthworks – Area limit, including trenching	Support	Agree with the limit of 500m <sup>2</sup> trenching open at one time for Commercial and Mixed Use Zones, Industrial Zones, Open Space and Recreation Zones and Special Purpose Zones	Retain
40	INF – Infrastructure	Standard INF-S18 Earthworks and vegetation removal – Reinstatement	Support	These standards provide certainty for operators	Retain
41	INF – Infrastructure	Standard INF-S20 Removal of indigenous vegetation	Support	It appears that this standard does not limit the removal of indigenous vegetation, other than in the landscape and natural character overlays. If that interpretation is correct the standard is supported. If that interpretation is incorrect, the	Retain

#	Chapter	Provision	Position	Reasons	Relief Sought
				Gas Transmission Corridor should be included in the list of exemptions.	
42	PINF – Protection of Infrastructure	Whole chapter	Support in part	Support the overall direction of the chapter subject to specific requests below. To the extent that any changes are proposed to the chapter during the reporting and hearings process Clarus may seek to respond to these at the time.	Retain the chapter as notified, subject to making the changes proposed in this submission
43	PINF – Protection of Infrastructure	Whole chapter	Support in part	<p>The emphasis on protection of the Gas Transmission Network and the National Grid is supported. The chapter has a very limited scope. It should be extended to other significant energy storage, distribution or transmission facilities. It is noted that some of the objectives and policies refer to 'regionally significant infrastructure' which is broader and includes:</p> <p>a. pipelines for the distribution or transmission of natural or manufactured gas or petroleum, including any associated fittings, appurtenances, fixtures or equipment</p> <p>e. facilities for the generation and/or transmission of electricity where it is supplied to the National</p>	Extend the chapter's scope (objectives, policies and rules) to include regionally significant infrastructure in general

#	Chapter	Provision	Position	Reasons	Relief Sought
				grid and/or the local distribution network,  f. facilities for the electricity distribution network, where it is 11kV and above	
44	PINF – Protection of Infrastructure	Policy PINF-O1 – Adverse Effects on Infrastructure	Support	This policy is appropriate	Retain
45	PINF – Protection of Infrastructure	Policy PINF-P1 – Protecting Regionally Significant Infrastructure	Support	This policy is appropriate	Retain
46	PINF – Protection of Infrastructure	Policy PINF-P2 – Adverse Effects on Gas Transmission Infrastructure	Support	This policy is appropriate	Retain
47	PINF – Protection of Infrastructure	Rule PINF-R1 – Activities in the Gas Transmission Pipeline Corridor	Support	<p>This rule addresses activities (other than buildings and structures) in the gas transmission corridor. It provides for RDIS activity status for an ‘activities sensitive to gas transmission infrastructure’ as defined in the Interpretation.</p> <p>These activities generally should not establish at all within 15m of the Gas Transmission Pipeline, i.e. within the Gas Transmission Pipeline Corridor. This is</p>	Retain

#	Chapter	Provision	Position	Reasons	Relief Sought
				<p>considerably less than the buffer provided in the Hazardous Substances Risk Management Overlay which extends about 100m radius around the Seaview tank farms. New activities sensitive to significant hazardous facilities are NC within that Overlay (Rule HS-R3). In the case of the gas transmission pipeline it is buried which reduces the risk.</p> <p>We also note that if NOR WRC-12 is confirmed then Greater Wellington would not be bound by Rule PINF-R1 and could locate activities such as a visitor centre close to the pipeline with no resource consent requirement.</p> <p>The consideration in the rule of notifying the pipeline owner and operator is supported.</p>	
48	PINF – Protection of Infrastructure	Rule PINF-R2 – Buildings and Structures in the Gas Transmission Pipeline Corridor	Support	<p>This rule adequately protects both the pipeline and the potential buildings and structures. A 15m trigger distance from the centreline of the pipeline (30m corridor) is sufficient.</p> <p>The consideration to notify the pipeline owner and operator is supported.</p>	Retain

#	Chapter	Provision	Position	Reasons	Relief Sought
49	REG - Renewable Electricity Generation	Whole chapter	Support in part	<p>The intent of the chapter is supported but we do not agree that it should be limited to renewable electricity. While this is the subject of the NPS REG there are other forms of renewable and low-carbon energy that should be equally supported. These may arise from (e.g.) landfill gas capture, biowaste digestion, wastewater treatment plant capture or importation. Hydrogen fuel cells are a further possible renewable energy source, which may not meet the definition of 'renewable electricity generation' under the NPS or the District Plan, as the energy is not directly generated from "solar, wind, hydroelectricity, geothermal, biomass, tidal, wave, or ocean current energy sources."</p> <p>This approach would be more consistent with RPS Objective 9 and Policy 7, which direct councils to include policies and/or methods in district and regional plans that recognise the benefits of (all forms of) renewable energy rather than only electricity. Policy 9 of RPS Plan Change 1 (decisions version) refers to "Promoting greenhouse</p>	<p>Rename the chapter '<u>Renewable Energy Sources and Electricity Generation</u>'</p> <p>Alter the objectives, policies and rules to support renewable gas and liquid energy sources as well as renewable electricity.</p>

#	Chapter	Provision	Position	Reasons	Relief Sought
				gas emission reduction and uptake of low emission fuels” and “(c) an increase in the uptake of low emission or zero-carbon fuels, biofuels and new technologies”. This would include renewable liquid and gas fuels.	
50	REG - Renewable Electricity Generation	Objective REG-O1 Benefits of renewable electricity generation	Support in part	Supportive of renewable electricity. Does not include renewable liquid and gas energy sources	Include an additional objective to support renewable liquid and gas energy sources and consequential changes to policies and rules to implement this objective (see below)
51	REG - Renewable Electricity Generation	Objective REG-O2 Providing for renewable electricity generation	Support in part	Supportive of renewable electricity. Does not include renewable liquid and gas energy sources	Include an additional objective to support renewable liquid and gas energy sources and consequential changes to policies and rules to implement this objective (see below)
52	REG - Renewable Electricity Generation	(Proposed new) Objective REG-03 Providing for renewable liquid and gas energy sources			Insert new objective: <u>Renewable liquid and gas energy infrastructure and activities are able to establish and operate in appropriate locations within Lower Hutt while:</u> <ol style="list-style-type: none"> <li>1. <u>Managing adverse effects on the environment, and</u></li> <li>2. <u>Recognising their practical constraints including those arising from their functional needs, operational needs and technical requirements.</u></li> </ol>

#	Chapter	Provision	Position	Reasons	Relief Sought
53	REG - Renewable Electricity Generation	Policy REG-P1 Benefits of renewable electricity generation	Support in part	Does not include renewable liquid and gas energy sources	Add after 'renewable electricity generation' in the policy name and the first line:  <u>...and renewable liquid and gas energy sources</u>
54	REG - Renewable Electricity Generation	Policy REG-P2 Consideration of the adverse effects of renewable electricity generation activities	Support in part	Does not include renewable liquid and gas energy sources	Add after 'renewable electricity generation' in the policy name and the first line:  <u>...and renewable liquid and gas energy sources</u>
55	REG - Renewable Electricity Generation	Policy REG-P3 Operating, maintaining and repairing renewable electricity generation activities	Support in part	Does not include renewable liquid and gas energy sources	Add after 'renewable electricity generation' in the policy name and sub-items 1 and 2:  <u>...and renewable liquid and gas energy sources</u>
56	REG - Renewable Electricity Generation	Policy REG-P5 Upgrading and developing renewable electricity generation activities	Support in part	Does not include renewable liquid and gas energy sources	Add a new subsection to the policy: <u>Provide for new or upgraded renewable liquid and gas energy activities, while:</u>  <ul style="list-style-type: none"> <li>a. <u>Minimising adverse effects on landscape, visual and amenity values,</u></li> <li>b. <u>Avoiding adverse effects on urban environments,</u></li> <li>c. <u>Minimising adverse noise effects on activities sensitive to noise,</u></li> </ul>

#	Chapter	Provision	Position	Reasons	Relief Sought
					d. <u>Managing odour effects, and</u> e. <u>Managing heath and safety effects in accordance with national guidance.</u>
57	REG - Renewable Electricity Generation	Rules	Support in part	These should be updated to reflect the above points regarding REG objectives and policies.	Update the rules to give effect to requested changes to REG objectives and policies
HAZARDS AND RISKS					
58	CL – Contaminated Land	Whole chapter	Support	The approach to contaminated land is supported	Retain
59	HS – Hazardous Substances	Whole chapter	Support	The approach to hazardous substances is supported	Retain
NATURAL ENVIRONMENT VALUES					
60	ECO - Ecosystems and Indigenous Biodiversity	Rule ECO-R2 Indigenous vegetation removal	Support in part	Agree that indigenous vegetation removal should be permitted in Residential Zones (ECO-R2.2) and Natural Open Space Zone (ECO-R2.3) where the indigenous vegetation removal is  “to maintain, operate, repair or decommission existing infrastructure”.  Add ‘upgrade’ to the list.	Retain  Add <u>upgrade</u> after ‘repair’

#	Chapter	Provision	Position	Reasons	Relief Sought
SUBDIVISION					
61	SUB - Subdivision	Policy SUB-P9 Subdivision for infrastructure	Support	This policy is appropriate	Retain
62	SUB – Subdivision	Policy SUB-P26 Subdivision of land within the Gas Transmission Pipeline Corridor	Support	This policy is appropriate	Retain
63	SUB - Subdivision	Rule SUB-R25 Subdivision of land within the Gas Transmission Pipeline Corridor	Support in part	The intent of the rule is supported. Please note that there is an incorrect reference in sub-part 2. This should refer to SUB-R25.1 rather than SUB-R26.1	Change the reference in sub-part 2 to refer to SUB-R25.1
GENERAL DISTRICT WIDE MATTERS					
64	EW – Earthworks	Policy EW-P16 Earthworks within the Gas Transmission Pipeline Corridor not associated with infrastructure	Support	This policy is appropriate. We note that it is repetitive with “the safe and efficient functioning, operation, maintenance and repair, upgrading and development” stated 3 times.	Retain
65	EW – Earthworks	Rule EW-R17 Earthworks within the Gas Transmission Pipeline Corridor not associated with infrastructure	Support	This rule is appropriate, including the requirement for notification to the owner and operator of the pipeline.	Retain


#	Chapter	Provision	Position	Reasons	Relief Sought
66	EW – Earthworks	Standard EW-S14 Earthworks within the Gas Transmission Pipeline Corridor not associated with infrastructure	Support	This standard helps to ensure that the pipeline is safe.	Retain
<b>ZONES</b>					
67	LIZ - Light Industrial zone	Whole chapter	Support	The provisions are appropriate	Retain
68	GIZ - General Industrial Zone	Whole chapter	Support	The provisions are appropriate	Retain
69	GIZ - General Industrial Zone	Whole chapter	Support	The provisions are appropriate	Retain
70	NOSZ - Natural Open Space Zone	Objective NOS-O2	Support in part	The zone includes infrastructure which necessarily must traverse some OSZ areas in order to provide essential services to residents and businesses. These include electricity and gas in particular and other services such as telecommunications and three waters.	Include an additional point under (b): <u>... or</u> <u>iv. Have a functional or operational need to be located in the zone</u>
71	NOSZ - Natural Open Space Zone	Objective NOS-O3	Support in part	The zone includes infrastructure which necessarily must traverse some OSZ areas in order to provide essential services to residents and businesses. These include electricity and gas in particular and other services such	Include a new point: <u>... or</u> <u>d. includes essential infrastructure only to the extent that this has a functional or operational need to be located in the zone.</u>

#	Chapter	Provision	Position	Reasons	Relief Sought
				as telecommunications and three waters.	
72	NOSZ - Natural Open Space Zone	Policy NOSZ-P2 Compatible activities	Support	The policy recognises activities that have a functional and operational need to be in the zone	Retain
73	NOSZ - Natural Open Space Zone	Policy NOSZ-P3 Potentially incompatible activities	Support	The policy recognises activities that have a functional and operational need to be in the zone	Retain
DESIGNATIONS					
74	WRC-12 Belmont Regional Park	Whole Notice of Requirement	Oppose in part	<p>The need for a designation to provide for the activities stated is not very clear. There are no Proposed District Plan overlays over the Regional Park which would appear to limit most normal parks activities, although the NOR states that there are. Many of the activities listed in the NOR are already permitted. These are stated in the NOR as including:</p> <ul style="list-style-type: none"> <li>• Recreation</li> <li>• Conservation</li> <li>• Protection</li> <li>• General park management</li> <li>• Rural activities</li> <li>• Development, operation, upgrade etc of parks assets and public spaces.</li> </ul>	<p><b>Preferred relief:</b></p> <p>Exclude the gas transmission pipeline corridor entirely from the boundary of the proposed designation. In other words, WRC-12 would not extend over any land within 15m of the transmission pipeline.</p> <p><b>Alternative relief:</b></p> <p>Require that the WRC-12 designation purpose and the activities authorised by it are more clearly specified before any confirmation as part of the District Plan.</p> <p>Include greater detail about how earthworks, buildings and structures are to be managed, in situations where the NOR proposes these activities to be non-consented and with no outline plan required (subject to thresholds).</p> <p>The requiring authority (GWRC) to be required to advise or consult with Clarus</p>

#	Chapter	Provision	Position	Reasons	Relief Sought
				<p>The NOR refers to “activities permitted in the operative reserve management plan’. This provision is uncertain as the management plan can be altered outside the District Plan process. The current management plan is Toitū Te Whenua Parks Network Plan 2020-30. This is a management plan for all regional parks, including 18 pages about Belmont Regional Park. The proposed activities in the management plan are often generic and preliminary (e.g. a requirement to undertake master planning, which may be a separate process) and provide little certainty about the ultimate activities and outcomes which would occur.</p> <p>Page 10 states that “a draft of this NOR was provided to affected landowners and major stakeholders in October 2024.” Clarus has no record of this consultation.</p> <p>Section 4.7 Infrastructure is unclear. It says that it covers operation and upgrade (etc) of <u>all infrastructure within the regional park, consistent with the designation purpose</u>. It then</p>	<p>prior to undertaking any works in the gas transmission pipeline corridor</p> <p>Another possible approach is that the rules in the PINF – Protection of Infrastructure and EW - Earthworks Chapters which are relevant to the Gas Transmission Pipeline Corridor (GTPC) continue to apply in the designation. This is explained in the subsequent request in this submission.</p>

#	Chapter	Provision	Position	Reasons	Relief Sought
				<p>excludes water supply and national grid infrastructure. There is no mention of gas infrastructure.</p> <p>There is no requirement in the NOR for GWRC to advise or consult with Clarus prior to undertaking works close to the pipeline.</p> <p>Clarus would strictly require s176 RMA approval from GWRC to undertake any works in the Regional Park, even where these works are currently enabled by easements.</p>	
75	WRC-12 Belmont Regional Park	NOR proposed conditions	Oppose in part	<p>Condition 4 would enable works, which would otherwise be controlled by the PINF chapter and EW chapter provisions which protect the Gas Transmission Pipeline Corridor, to occur as non-consented activities and with no outline plan process.</p> <p>Particular concerns are excavations or boring close to the pipeline (creating risks to the pipeline) and placement of occupied facilities near the pipeline (creating risks to people).</p>	<p>If the gas transmission pipeline corridor is not excluded from the boundary of the proposed designation.</p> <p>New condition:</p> <ul style="list-style-type: none"> <li>• <u>The Requiring Authority shall recognise the need for regionally significant infrastructure to operate and, where necessary, develop within the Regional Park.</u></li> </ul> <p>New parts to Condition 4:</p> <ul style="list-style-type: none"> <li>• <u>District Plan Standard EW-S14 will apply to earthworks within the Gas Transmission Pipeline Corridor [0.4m maximum depth of earthworks]</u></li> </ul>

#	Chapter	Provision	Position	Reasons	Relief Sought
					<ul style="list-style-type: none"> <li><u>New buildings and structures within the Gas Transmission Pipeline Corridor are excluded [from the Outline Plan exemptions provided by Condition 4].</u></li> </ul> <p>New condition:</p> <ul style="list-style-type: none"> <li><u>The Requiring Authority shall consult with the gas transmission pipeline owner and operator for any works within 15m of the gas transmission pipeline.</u></li> </ul>
76	Maps	Gas Transmission Pipeline Corridor	Oppose	The maps state that the Gas Transmission Pipeline Corridor is informational and 'does not form part of the District Plan'. We are concerned that this may undermine the rules which are linked to the corridor. We suggest alternative wording is used in the maps to clarify that the pipeline corridor is part of the legally binding plan.	<p>Replace with words to the effect of:</p> <p><u>The exact location of the corridor cannot be mapped with full accuracy. Provisions which reference the corridor are to be interpreted in relation to the actual pipeline location as determined on site.</u></p>



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