

## **Attachment 4 to Report 01.322**

### **Part 3**

#### **Draft Utilities and Services Policy Submission Summary Sheets**

## HRFMP : Summary Sheet Utilities & Services



**Submitter:**

**Fish & Game New Zealand**

**Submission number:**

**US1**

### **Submission Summary**

#### ***Issues Related to Utilities & Services Policy:***

- 1.a Sound and responsible approach taken.

#### ***Other Matters:***

- 1.b Professional approach to management of river control responsibilities on the Hutt River appreciated.

### **Relief Sought:**

No relief requested.

### **Flood Protection Group Response:**

- 1.a Self-explanatory.
- 1.b Self-explanatory.

### **Recommended Relief to Deal with Issues Raised:**

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<b>Submitter:</b>	<b>Transit New Zealand</b>
<b>Submission number:</b>	<b>US2</b>

### Submission Summary

#### *Issues Related to Utilities & Services Policy:*

- 2.a Transit and WRC have a River Works Agreement for location of the highway (SH2) in the Hutt River floodway.

#### *Other Matters:*

### Relief Sought:

- 2.1 Discussion of draft policies as a change to the River Works Agreement.
- 2.2 Formalisation of a new agreement.

### Flood Protection Group Response:

- 2.a The Flood Protection Group believes that the River Works Agreement is adequate (in effect it is an agreement under Policies E3 and I1).
- 2.1, 2.2 This would be covered by Policies E3 and I1 which provide the opportunity for individual agreements.

### Recommended Relief to Deal with Issues Raised:

Accepting in part:

- 2.1 WRC and Transit meet to discuss the River Works Agreement and Utilities & Services Policy.

Declining:

- 2.2 Current River Works Agreement adequate.

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<b>Submitter:</b>	<b>Natural Gas Corporation</b>
<b>Submission number:</b>	<b>US3</b>

### Submission Summary

#### *Issues Related to Utilities & Services Policy:*

##### **Policy E1**

- 3.a Difficult to ascertain whether a service caused stopbank failure.
- 3.b Policy does not address 'who pays'.
- 3.c Policy does not provide for benefit / cost analysis of service removal.
- 3.d Cost to the utility and community for disruption is ignored.

##### **Policy N1**

- 3.e Alternatives approved by WRC may not be possible, practical or cost-effective to consumers of utility services.

##### **Policy N2**

- 3.f From a Lifelines perspective concentrating utility services at common points may increase risk.

##### **Policy I1**

- 3.g There could be benefits in discussing common issues with all utility operators, possibly through the Wellington Utility Operators Group.

#### ***Other Matters:***

- 3.h More time could have allowed fuller consideration of issues.

#### **Relief Sought:**

- 3.1 Acknowledge points raised in 3.e, 3.f, 3.g in Draft Utilities and Services Policy.

#### **Flood Protection Group Response:**

- 3.a Policy is not about responsibility but reducing risk or chance of failure.
- 3.b Policy I1 allows for individual negotiation on the basis of benefit. Cost sharing arrangements would be agreed in the negotiation.
- 3.c Intention is to unconditionally remove services from stopbanks because they increase the risk of stopbank failure.
- 3.d WRC would work with service provider to minimise disruption (Policy I1).

<b>Submitter:</b>	<b>Natural Gas Corporation</b>
<b>Submission number:</b>	<b>US3</b>
<p><b>Flood Protection Group Response cont.</b></p> <ul style="list-style-type: none"> <li>• 3.e WRC will consider reasonable proposals. Cost efficiency to a commercial operator should not prejudice a sound flood protection position.</li> <li>• 3.f WRC should consider this at the design phase for any project. Well engineered dedicated crossings reduce risk to the flood protection system and are preferred. Experience has shown that it is difficult to control the quality of a service crossing construction and its maintenance.</li> <li>• 3.g Discussions have been held with the Technical Liaison Group, Lifelines and utility operators groups. These will continue.</li> <li>• 3.h Self-explanatory.</li> </ul>	
<p><b>Recommended Relief to Deal with Issues Raised:</b></p> <p>Accepting in part:</p> <ul style="list-style-type: none"> <li>• 3.1 Recognise 3.e, 3.f, 3.g and Flood Protection Group response in explanations to Policies N1, N2, I1.</li> </ul>	

## HRFMP : Summary Sheet Utilities & Services



<b>Submitter:</b>	<b>Upper Hutt City Council</b>
<b>Submission number:</b>	<b>US4</b>

### Submission Summary

#### *Issues Related to Utilities & Services Policy:*

##### **Policy E1**

- 4.a Cannot agree with policy for water, sewerage and stormwater and sewerage system emergency overflows.
- 4.b Does not consider the complexities of stormwater and sewerage.

##### **Policy E2**

- 4.c Rationalisation should be justified by benefit cost analysis.
- 4.d Does not consider the complexities of stormwater and sewerage.
- 4.e Rationalising the number and location of outlets is likely to exacerbate upstream problems.

##### **Policy E3**

- 4.f WRC and UHCC serve the same people. The community would expect their assets to be adequately protected.
- 4.g Would the standard of protection for stopbanks apply to services in the River Corridor?

##### **Policy E4**

- 4.h The standard of protection for key network facilities cannot be decided until the District Plan Process is finalised.

##### **Policy N2**

- 4.i Benefit cost analysis costs and design constraints should be given due consideration in choosing service crossings.

##### **Policy N3**

- 4.j Benefit-cost analysis, costs and design constraints should be given due consideration when rationalising stormwater outlets.
- 4.k Requires further explanation of 'would benefit large areas'.

#### ***Other Matters:***

<p><b>Submitter:</b> <b>Submission number:</b></p>	<p><b>Upper Hutt City Council</b> <b>US4</b></p>
<p><b>Relief Sought:</b></p> <ul style="list-style-type: none"> <li>• 4.1 Policy E1 should recognise water, stormwater and sewerage as special cases.</li> <li>• 4.2 Rationalisation of existing and new outlets should be justified on a benefit-cost basis and recognise costs and design constraints.</li> <li>• 4.3 Rationalisation of outlets should not exacerbate upstream problems on the floodplain.</li> <li>• 4.4 Utility and service assets in the floodplain and River Corridor should be adequately protected.</li> </ul>	
<p><b>Flood Protection Group Response:</b></p> <ul style="list-style-type: none"> <li>• 4.a, 4.b, 4.d, 4.1 Agreed that sewerage and stormwater are particularly important and have some unique characteristics as they are difficult to shift, water is not. This should be considered in negotiating the individual agreements under I1.</li> <li>• 4.c, 4.i, 4.j, 4.2 Agreed that benefit-cost analysis, cost and design constraints should be factors in decision making. The benefits and costs of the flood protection system should also be included.</li> <li>• 4.e, 4.k, 4.3 This is not necessarily the case. A single gravity or pumped outlet replacing two or more outlets may improve outlet conditions and reduce the number of ponding areas and service a larger area.</li> <li>• 4.f This is so, but beyond the actual design standard requirements for the flood protection system, costs should be negotiated under Policy I1.</li> <li>• 4.g, 4.4 The agreed standard of flood protection will be provided to the at-risk community by the flood protection measures. This is provided by the mix of channel geometry, edge protection, berm width and stopbank height and cross-section. In the berm, protection to utilities and services is incidental. However, specific agreements for stormwater and sewerage may be negotiated under I1.</li> <li>• 4.h Correct, but the community expectation is that this standard will be sought.</li> </ul>	
<p><b>Recommended Relief to Deal with Issues Raised:</b></p> <p>Accepting in part:</p> <ul style="list-style-type: none"> <li>• 4.1 The explanations to policies should recognise stormwater and sewerage as essential services requiring specific considerations.</li> <li>• 4.2, 4.3 Benefit-cost analysis and cost and design constraints will be recognised as factors in considering the rationalisation of stormwater and sewerage outlets in the design phase of a project.</li> <li>• 4.4 Specific agreements for stormwater and sewerage may be negotiated under Policy I1.</li> </ul>	

## HRFMP : Summary Sheet Utilities & Services



<b>Submitter:</b>	<b>Transpower New Zealand Ltd</b>
<b>Submission number:</b>	<b>US5</b>

### Submission Summary

#### *Issues Related to Utilities & Services Policy:*

- 5.a Services and utilities are not defined and their use is not consistent across the policies.
- 5.b The individual service relocation costs is not mentioned, but was in the previous version.

#### **Policy E1**

- 5.c Does Policy E5 mean that Policy E1 does not apply to the Melling substation?

#### **Policy E3**

- 5.d Concern that 'community' which is not defined excludes utilities and services.
- 5.e The planning of flood protection measures should incorporate consideration of the impacts on lawfully established services / utilities and their protection standard.

#### **Policy E5**

- 5.f The intention of this Policy should be incorporated into the rules developed by WRC, HCC and UHCC for managing services and utilities in the floodplain.

#### **Policy N2**

- 5.g It is assumed that the location of Transpower's Haywards-Melling B transmission line is accepted.
- 5.h In the long-term works may be initiated to improve the protection of Tower 31 (adjacent to Melling substation) which is within the 80m primary erosion zone.

#### **Other Matters:**

#### **Relief Sought:**

- 5.1 Services and utilities should be defined and the policies should reflect the application to services, utilities or both.
- 5.2 The incidence of service relocation costs should be addressed.
- 5.3 The policies should recognise the Melling substation is a special case exempt from other Utilities and Services policies.



<p><b>Submitter:</b> <b>Submission number:</b></p>	<p><b>Transpower New Zealand Ltd</b> <b>US5</b></p>
<p><b>Relief Sought:</b></p> <ul style="list-style-type: none"> <li>• 5.4 Utilities and services should not be excluded from ‘the community’.</li> <li>• 5.5 The Utilities &amp; Services Policy should be incorporated in any rules developed by WRC, UHCC and HCC for managing utilities and services in the River Corridor and floodplain.</li> </ul>	
<p><b>Flood Protection Group Response:</b></p> <ul style="list-style-type: none"> <li>• 5.a, 5.1 Self-explanatory.</li> <li>• 5.b, 5.2 Previous version was policy principles. Comments were considered in developing the Draft Policy. Policy I1 allows for individual negotiation on the basis of benefit. Cost sharing arrangements would be agreed in the negotiation.</li> <li>• 5.c, 5.3 Melling substation is a special case and E5 recognises this. Any impacts on the flood protection system adjacent to Melling substation would still be bound by other policies.</li> <li>• 5.d,5.e, 5.4 No problem where utilities and services are located in the floodplain protected by the FMP measures. In the River Corridor protection to utilities and services is incidental. The responsibility for any higher standard lies with the owner and the direct beneficiaries.</li> <li>• 5.f, 5.5 This matter would need to be discussed with Hutt and Upper Hutt City Councils.</li> <li>• 5.g, 5.h The strategy agreed with Transpower provided for this pylon to be relocated in the long-term beyond the 80m Erosion Zone. Interim arrangements to protect the pylon will be considered under Policy E3 as an extension to Policy E5. This also covers the Transmission Line.</li> </ul>	
<p><b>Recommended Relief to Deal with Issues Raised:</b></p> <p>Accepting:</p> <ul style="list-style-type: none"> <li>• 5.2 This can be negotiated under Policy I1 .</li> </ul> <p>Accepting in part:</p> <ul style="list-style-type: none"> <li>• 5.1 Services and utilities and key network facilities will be defined and the incidence of policies to them will be clarified.</li> <li>• 5.4 Utilities and services outside the River Corridor are included in ‘the community’, however, in the River Corridor protection for utilities and services is incidental.</li> </ul>	
<p><b>Recommended Relief to Deal with Issues Raised cont.</b></p> <ul style="list-style-type: none"> <li>• 5.5 This matter will be discussed with Hutt and Upper Hutt City Councils at the appropriate time.</li> </ul> <p>Declining:</p> <ul style="list-style-type: none"> <li>• 5.3 Melling substation and associate infrastructure and network are not exempt from other policies.</li> </ul>	

## HRFMP : Summary Sheet Utilities & Services



<b>Submitter:</b>	<b>Wellington Regional Council Water Group</b>
<b>Submission number:</b>	<b>US6</b>

### Submission Summary

#### *Issues Related to Utilities & Services Policy:*

- 6.a Policy N2. Generally, bulk water pipes have a large diameter and would have to pierce or go under stopbanks.
- 6.b Only one crossing planned at present and this can be at a designated service crossing.

#### *Other Matters:*

### Relief Sought:

- 6.1 Recognition that WRC bulk water water pipes would likely have to pierce or go under stopbanks.

### Flood Protection Group Response:

- 6.a, 6.b, 6.1  
The Flood Protection Group generally prefers pipes to follow stopbank contour but this would be dealt with under Policy I1. There are no stopbanks at the planned crossing.

### Recommended Relief to Deal with Issues Raised:

Accepting in part:

- 6.1 Specific consideration should be given to issues associated with large diameter pipes.