

15 September 2023

Hearings Advisor  
Greater Wellington Regional Council

Attention: Whitney Middendorf

By e-mail: [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz)

## WELLINGTON REGIONAL POLICY STATEMENT – PROPOSED CHANGE 1 HEARING STREAM 4: URBAN DEVELOPMENT

### HEARING STATEMENT ON BEHALF OF POWERCO (SUBMITTER 134)

---

#### 1. INTRODUCTION

- 1.1 This is a hearing statement prepared on behalf of Powerco Limited (*Powerco*) on Hearing Stream 4 – Urban Development. This hearing statement represents the views of Powerco and is not expert evidence. Powerco will not be attending the hearing but ask that this Hearing Statement be tabled before the Panel.
- 1.2 Powerco has an interest in electricity and gas distributions networks and infrastructure in the Wellington Region. For the purpose of Hearing Stream 4, Powerco wishes to respond to the s42A report relating to Objective 22 and Policy 58, both of which are relevant to the provision of Powerco’s infrastructure.

#### 2. OBJECTIVE 22 (submission point S134.018 and FS24.020)

- 2.1 Powerco supports Objective 22 to the extent that it recognises the development of infrastructure as key to achieving well-functioning urban environments, as well as the need to provide for commercial and industrial development in appropriate locations. Powerco does not have issue with the merging of Objectives 22 and 22B, as recommended by the s42A report writer, to achieve well-functioning urban and rural areas.
- 2.2 The s42A report writer has recommended a new clause (h) on Objective 22 relating to the integration and sequencing of infrastructure with development. While Powerco will integrate and sequence the provision of its infrastructure with development where possible, this can prove problematic in some circumstances. For example, if a developer is staging in a manner that is at odds with the way in which Powerco provides its infrastructure and services for a development, or if the cumulative effect of development in the wider area requires new infrastructure to be established at a later date.
- 2.3 The integration and sequencing of infrastructure with development will more commonly occur with publicly funded infrastructure which is typically planned for well in advance through a long-term plan, transport plan or Infrastructure Strategy. This matter is addressed further below in relation to Policy 58.
- 2.4 Power considers that new clause (h) would benefit from a qualifier “where practicable” as follows (with the **text in red** being the amendments agreed with in s42A report and the **text in blue** being the further amendments sought by Powerco):

*(h) new or upgraded infrastructure, including transport infrastructure, is integrated and sequenced with development where practicable, and development densities are sufficient to support its provision and ongoing maintenance; and*

### 3. POLICY 58 AND EXPLANATION (submission point S134.018)

- 3.1 The Powerco submission sought that Policy 58 and explanation should apply to all infrastructure to support new urban development and should not be limited to only three waters and transport infrastructure. This submission point has been rejected by the s42A report writer on the basis that the policy does reference 'all infrastructure'.
- 3.2 The s42A report recommended amendment to clause (c) is that the infrastructure be "*delivered through a long-term plan, transport plan or Infrastructure Strategy*". Powerco's concern is that these plans and strategies are generally appropriate for publicly funded infrastructure, such as three waters and transport infrastructure, but do not always provide for, or integrate well with, privately funded infrastructure. In this sense the amended policy does not deal with all infrastructure equally.
- 3.3 Powerco prefers that the policy reverts to wording that is similar to the notified version that infrastructure is available, or is consented, designated or programmed to be delivered "prior to development occurring". Further, the policy explanation can record some of the ways in which publicly funded infrastructure is programmed to be delivered, such as through a long-term plan, transport plan or Infrastructure Strategy.
- 3.4 This could be addressed by amending the policy and explanation, as follows (with the **text in red** being the amendments agreed with in s42A report and the **text in blue** being the further amendments sought by Powerco):

*(c) (b) all infrastructure required to serve new development, including low or zero carbon, multi modal and public transport infrastructure, is available, or is consented, designated or programmed to be delivered prior to development occurring.*

#### **Explanation**

*Policy 58 seeks to avoid isolated urban development which is not serviced by infrastructure. The policy seeks that ~~requires urban development to be~~ is sequenced to ensure existing infrastructure capacity is efficiently and effectively used and ~~such~~ that infrastructure that is necessary to service the development will be provided before the development occurs. This includes both all infrastructure that would be necessary to support the development. For three waters infrastructure and transport infrastructure, including low or zero carbon, multi modal and public transport infrastructure this should be planned for through a long-term plan, transport plan or Infrastructure Strategy.*

### 4. CONCLUDING STATEMENT

- 4.1 Thank you for your time and acknowledgement of the issues raised in the submissions from the Powerco. Please do not hesitate to contact the writer ([miles.rowe@4sight.co.nz](mailto:miles.rowe@4sight.co.nz), ph. 0272762532) should you wish to clarify any matters addressed herein.

Kind regards,



Miles Rowe  
Principal Planning Consultant  
4Sight Consulting Ltd