



Submission by First Gas Ltd

Proposed Opotiki District Plan

18 November 2016

Proposed Ōpōtiki District Plan
Submission Form

SUBMISSIONS MUST BE RECEIVED NO LATER THAN
 4pm, Monday 18 November 2016



SUBMITTER DETAILS:

NAME: FIRST GAS LTD

ORGANISATION: (if appropriate) _____

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MY SUBMISSION:

Provision Number*	Provision Title	State whether you SUPPORT or OPPOSE the Provision	Relief sought (Specify the amendments you wish to be made to the Provision).	Reasons:
<i>Refer attached submission.</i>				

* Specify the Objective, Policy, Rule, Other method, or Map Number your submission relates to.
 If more space required please attach additional paper with your name and contact details on each sheet.

SEND YOUR SUBMISSION FORM TO:

The Chief Executive Ōpōtiki District Council PO Box 44 ŌPŌTIKI 3162	Physically deliver to Council offices: 108 St John Street, Ōpōtiki	email to: Districtplan@odc.govt.nz fax to: 07 315 7050
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Signature [Handwritten Signature] Date 15/11/16

Person making the submission or authorised to sign on behalf of an organisation making the submission. (A signature is not required if submitting by electronic means).

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Thank you for taking the time to provide your comments



1 Introduction to First Gas Ltd

Following purchase of the gas transmission network from Vector Gas Ltd on 20 April 2016, First Gas Ltd ("First Gas") is now the owner and operator of approximately 2500km of high pressure natural gas transmission pipelines throughout the North Island.

Pursuant to section 167 of the Resource Management Act 1991 ('RMA') (and section 15 of the Interpretation Act 1999), the Minister for the Environment gave notice on 5 July 2016 that the Amendment of Resource Management (Approval of National Gas Corporation of New Zealand Ltd as a Requiring Authority) Notice 1994, dated 22 July 2009 has been amended by replacing "Vector Gas Limited" with "First Gas Limited". A copy of this notice can be supplied on request.

First Gas' below ground gas transmission pipelines deliver gas from production stations in Taranaki through to various towns and locations throughout the North Island. The gas transmission system delivers gas to distribution networks via 'Delivery Points'. Delivery Points are above ground pressure regulating station sites which transition between gas in the high pressure system to the medium to low pressure distribution pipeline network.

Within the Opotiki district, First Gas owns and operates the gas distribution network (inclusive of three above-ground stations), which reticulates parts of the Opotiki township and the Hospital Hill area. First Gas's assets in the District are illustrated in **Figure 1** below.

2 First Gas Interests in the Opotiki District Plan

In broad terms, First Gas' interest in the Opotiki District Plan's approach to managing land use activities can be summarised as making sure the District Plan:

- (a) enables the operation, maintenance, upgrade development and/ or removal of its assets and operations; and
- (b) protects its assets and operations from others' land-use activities.

2.1 Operation, maintenance, replacement, upgrade, removal and development

First Gas's gas transmission network is regionally and nationally significant infrastructure in that it delivers significant benefits to people's social and economic well-being, as well as health and safety. In light of the benefits provided by the transmission network, the safe, efficient and effective operation, maintenance, replacement, upgrade, removal and/ or development of the network needs to be provided for in the District Plan through enabling land use provisions, while ensuring adverse effects generated by those activities and operations are appropriately managed.

2.2 Protection from third party works

The high pressure gas transmission pipelines are required to meet the safety and operational requirements of the Health and Safety in Employment (Pipelines) Regulations 1999 and the operating code Standard AS2885 Pipelines – Gas and Liquid Petroleum (AS2885). First Gas is required to ensure the protection and integrity of the pipeline is maintained to ensure the safety of the public, property and the environment.

Third party interference is one of the main risks to the safety and integrity of the underground pipelines. Activities which may affect the gas pipelines should take into account the location and protection requirements of the pipelines. Activities in the vicinity of gas transmission pipeline and ancillary equipment should be carried out in such a way so as not to compromise the safe and efficient operation of the gas transmission network.

Figure 1: Plan of First Gas Assets in the Opotiki District



3 Regional Policy Statement – Bay of Plenty

The District Plan must ‘give effect’ to a Regional Policy Statement (RPS). The operative RPS (Bay of Plenty) includes the following key provisions which have a direct influence on District Plan content as it relates to First Gas’ assets and activities within the district:

Provision	Wording
Issue 2.3.3.1	Reverse sensitivity effects on infrastructure <i>Inappropriate subdivision, use and development can result in reverse sensitivity effects on existing or planned infrastructure, as well as the maintenance and upgrade of infrastructure necessary to support the sustainable growth of the region.</i>
Issue 2.3.3.5	Effects of infrastructure: <i>While infrastructure enables communities to provide for their social economic and cultural wellbeing, it can also generate adverse effects, including on existing lawfully established land uses.</i>
Objective 6	<i>Provide for the social, economic, cultural and environmental benefits of, and the use and development of nationally and regionally significant infrastructure and renewable energy</i>
Objective 7	<i>Provide for the appropriate management of:</i> <i>(a) any adverse environmental effects (including effects on existing lawfully established land uses) created by the development and use of infrastructure and associated resources;</i> <i>(b) any reverse sensitivity effects on established, consented or designated infrastructure</i>
Policy EI 3B	<i>Protect the ability to develop, maintain, operate and upgrade existing, consented and designated nationally and regionally significant infrastructure from incompatible subdivision, use or development. Ensure that where potentially incompatible subdivision, use or development is proposed near regionally significant infrastructure, it should be designed and located to avoid potential reverse sensitivity effects.</i>
Policy EI 4B:	<i>Recognise and provide for the social, economic, cultural and environmental benefits of:</i> <i>(a) Nationally and regionally significant infrastructure, including:</i> <i>(i) The ability for people and goods to travel to, from and around the region efficiently;</i> <i>(ii) Maintaining public health and safety through the provision of essential services, supply of potable water and the collection and transfer of sewage;</i> <i>(iii) Maintaining access to energy so people can meet their energy needs;</i> <i>(iv) Maintaining access to telecommunication services so people can meet their communication needs; and</i> <i>(v) Maintaining reliable and resilient infrastructure for major industrial users and rural production activities to meet their needs to function effectively and efficiently.</i> <i>(b) Energy generated from renewable energy resources including:</i> <i>(i) Maintaining security of supply and diversifying energy sources;</i> <i>(ii) Reducing dependency on external energy sources;</i> <i>(iii) Reducing greenhouse gas emissions; and</i> <i>(iv) Reducing dependency on non-renewable energy sources</i>

‘Giving effect’ to the RPS essentially means that the District Plan must interpret the RPS through its provisions, and ultimately will ensure that:

- First Gas’ regionally (and nationally) significant assets are able to be safely, effectively and efficiently operated, maintained, upgraded, replaced, removed and / or developed while appropriately managing adverse effects; and,
- the adverse effects of development in proximity to First Gas’ regionally (and nationally) significant assets are managed and are reduced, minimised or avoided depending upon the context in which the development occurs.

4 General Submission

Without limiting the generality of this submission, First Gas seeks decisions on the Proposed Opotiki District Plan as sought in the attached **Schedule One**, and any consequential relief required to achieve the relief sought.

Schedule One details the specific provisions that First Gas is supportive of and/ or opposes, and also outlines relief sought by First Gas to address concerns with the Proposed Opotiki District Plan as currently drafted.

First Gas also wishes to thank Council on releasing a draft version of the Proposed Opotiki District Plan documentation and considering First Gas' comments in that context.

In summary, First Gas' submission generally seeks that:

- the gas transmission system is recognised as regionally and nationally significant infrastructure, as are the benefits that this infrastructure provides to the district (and beyond);
- the gas transmission system is enabled to be safely, effectively and efficiently operated, maintained, replaced, upgraded, removed and developed (i.e. recognised and provided for), including through an enabling activity status where there is a need for resource consent (i.e. not non-complying);
- the gas transmission system is recognised as having functional and operational requirements and constraints, including in respect of its location;
- there may be some occasions where works undertaken by First Gas may generate adverse environmental effects;
- that the adverse effects of third party development or activities in close proximity to the gas transmission system are managed to the extent that adverse effects on the network are reduced or avoided;
- that First Gas is identified as an affected party in the event resource consent is required in respect of potential effects on assets owned and operated by First Gas; and
- that the high pressure gas transmission pipeline is illustrated on the District Plan Maps to provide visibility of the network for plan users.

Schedule One: Detailed Submission by First Gas Ltd

Plan change Provision	Support/Oppose/ Amend	Submission/Reasons	Relief/Decision Sought
Chapter 1 – District Plan Introduction			
1.11 Assessment Criteria for Applications	Support with amendment	Chapter 1.11.3 lists the matters Council may consider when deciding whether or not to grant consent for a Discretionary Activity. Currently the listed matters do not make reference to effects on Regionally Significant Infrastructure. First Gas believes that Council should consider potential effects on Regionally Significant Infrastructure when considering whether to grant a discretionary consent, and in doing so would give effect to Objective 7 and Policy EI 3B of the BOP RPS.	<ul style="list-style-type: none"> Add an additional matter to those listed under Chapter 1.11.3: <u>20. Effects on the ability to access, operate, maintain and upgrade Regionally Significant Infrastructure.</u>
1.11.4.16	Support	Chapter 1.11.4 lists the matters for which conditions may be imposed. This includes the protection of existing network structures and facilities, and First Gas supports this.	<ul style="list-style-type: none"> Retain 1.11.4.16
Chapter 6 – Industrial Zone			
6.3 Activity Status			
Relationship of Network Utility and Industrial Zone Rules		<p>First Gas seeks the inclusion of a similar statement as contained in the Rural Zone chapter to the extent that network utilities are subject to the rules in Chapter 17 as opposed to the Industrial Chapter. This stand-alone rule framework is supported as opposed to zone based rules applying in addition to the network utility provisions.</p> <p>It is noted that network utilities are not enabled as a permitted activity under Rule 6.3.2.1 therefore if the zone rules apply, consent will be required by default. First Gas queries whether this is the intention of the District Plan.</p>	<ul style="list-style-type: none"> Delete statement under 6.3.1 stating that additional controls apply in relation to network utilities and add the following statement to be consistent with Chapter 8: <u>Network Utilities are subject to the provisions in Chapter 17 and are not subject to the Rules in this Chapter.</u>
Chapter 8 – Rural Zone			
8.1 Resource Management Issues			
Issue 6	Support	First Gas generally supports Issue 6 to the extent it identifies reverse sensitivity as a resource management issue for the district. This is considered to be appropriate in the context of network utilities and 'giving effect' to the BOP RPS (e.g. Objective 7 and Policy EI 3B).	<ul style="list-style-type: none"> Retain Issue 6.
Policy 8.2.1.5	Support	First Gas supports the policy provision to protect existing lawfully established activities, including infrastructure, from sensitive activities.	<ul style="list-style-type: none"> Retain Policy 8.2.1.5
8.3 Activity Status			

Plan change Provision	Support/Oppose/Amend	Submission/Reasons	Relief/Decision Sought
Network utilities not subject to Rural Zone Rules	Support	First Gas supports the District Plan structure to the extent that <i>Network Utilities</i> are subject to the rules in Chapter 17 as opposed to the Rural Chapter.	<ul style="list-style-type: none"> Retain the following statement: Network Utilities are subject to the provisions in Chapter 17 and are not subject to the Rules in this Chapter.
8.3.3.1 New Restricted Discretionary Activity		Add buildings and activities not complying with Standard 8.6.16 (as sought below).	<ul style="list-style-type: none"> New Restricted Discretionary Activity in Chapter 8.3.3.1: <u>5. Buildings and activities that do not comply with zone standard 8.6.16.</u> <p><i>Note: First Gas Ltd will be identified as an affected party for buildings and activities requiring resource consent for breaching Rural Zone standard 8.6.16.</i></p>
8.5 Assessment Criteria for Restricted Discretionary Activities			
8.5.1 New Assessment Criteria for Restricted Discretionary Activities		First Gas seeks the inclusion of criteria related to the effects on the safe, effective and efficient operation, maintenance, replacement and upgrade of its above-ground stations and the Gas Transmission Pipeline in the vicinity of the station be considered for restricted discretionary activities.	<ul style="list-style-type: none"> New Assessment Criteria for Restricted Discretionary Activities under Chapter 8.5.1: <u>8.5.1.7 Above ground incidental equipment associated with the Gas Transmission Pipeline</u> <p><u>1. Effects on the safe, effective and efficient operation, maintenance, replacement and upgrade of the above ground incidental equipment and the Gas Transmission Pipeline</u></p>
8.6 Zone Standards			
8.6.16 New Zone Standard		To address reverse sensitivity effects, First Gas seeks the inclusion of a setback for buildings and activities (including relocated buildings) from <i>above ground incidental equipment (i.e. stations) associated with the Gas Transmission Pipeline</i> . First Gas seeks that this be added to the Zone Standards.	<ul style="list-style-type: none"> New zone standard under Chapter 8.6:

Plan change Provision	Support/Oppose/Amend	Submission/Reasons	Relief/Decision Sought
		First Gas does not seek a set back from the Gas Transmission Pipeline itself, as the pipeline benefits from a legal easement. The intent of this submission point is to protect the functioning of the above-ground stations.	<p><u>8.6.16 Building setback from above ground incidental equipment associated with the Gas Transmission Pipeline</u></p> <p><u>1. New buildings and activities must be setback a minimum of 30m from the boundary of above-ground incidental equipment associated with the Gas Transmission Pipeline.</u></p>

Chapter 13 – Landscapes and Vegetation

13.3 Activity Status

13.3.2.1.7 Permitted Activities	Amend	Noting the red text (which may indicate this is outside the scope of the plan review?), First Gas seeks that Standard 7(e) be amended to include 'upgrade and replace.' The effects of the disturbance within the formation width for either maintenance, upgrade or replacement is considered to be the same, and furthermore this would be consistent with the proposed definition of 'maintenance, upgrading and replacement'.	<ul style="list-style-type: none"> Amend Standard 7(e): (e) It is within the existing formation width to maintain, <u>upgrade or replace</u> existing walking and cycling tracks, driveways, public or public roads, farm and forestry tracks, and <i>Network Utilities</i>.
13.3.2.1.7 Permitted Activities	Support	First Gas supports the inclusion of maintenance, upgrading and replacement of existing infrastructure as a permitted activity under sub-clause (g)	<ul style="list-style-type: none"> Retain permitted activity 13.3.2.1.7(g)
13.3.3.1 Discretionary Activity	Support	While network utilities are not specifically listed, First Gas supports an enabling activity status for network utility related activities.	<ul style="list-style-type: none"> Retain an enabling activity status (i.e. not non complying) for network utilities not able to comply with permitted activity performance standards

Chapter 15 – Subdivision

15.2 Objectives and Policies

Objective 15.2.2	Support	First Gas supports protecting the safe and efficient functioning of Regionally Significant Infrastructure from the subdivision of land, and also protecting the capacity of infrastructure to service new development.	<ul style="list-style-type: none"> Retain Objective 15.2.2
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Plan change Provision	Support/Oppose/Amend	Submission/Reasons	Relief/Decision Sought
New Policy 15.2.2.5	Support with amendment	First Gas seeks that a policy be inserted to manage subdivision near existing network utilities and Regionally Significant Infrastructure. The related objective (15.2.1) includes regionally significant infrastructure however the proposed policy framework does not include a policy to achieve that objective.	<ul style="list-style-type: none"> Add new Policy 15.2.2.5: <u>To manage subdivision to avoid sensitive land use or inappropriate activities from compromising the operation, maintenance, upgrading and development (including access) of network utilities and Regionally Significant Infrastructure.</u>
15.3 Subdivision Status			
15.3.4 The status of subdivision	Amend	First Gas seeks that the subdivision of land on which Gas Transmission Pipelines traverse be included in the activity table as a restricted discretionary activity. This is because subdivision can compromise the operation, maintenance, upgrading and development (including access) of First Gas's assets. In addition to operational implications, this will aid in pipeline safety as subdivisions change the class location classification and therefore the protection requirements required to be implemented by First Gas.	<ul style="list-style-type: none"> Amend Chapter 15.3.4: <u>14. Subdivision of land on which the Gas Transmission Pipelines traverses and incidental equipment is located.</u> - include as a Restricted Discretionary Activity in all zones. <p><u>Note: First Gas Ltd will be identified as an affected party for subdivisions breaching Subdivision standard 15.3.4.14.</u></p>
15.4 Subdivision Standards			
15.4.1.1 General Lot Dimensions	Support with amendment	First Gas seeks that minimum lot requirements exclude any areas of a site which have development restrictions, for example easements providing for the Gas Transmission Pipeline.	<ul style="list-style-type: none"> Amend 15.4.1.1: The minimum lot dimensions in each zone shall <u>relate to land without legally binding development restrictions (e.g. development restrictive easements).</u> <u>and</u> be as follows:
15.4.5 Lots for Public Utilities	Support	First Gas supports that minimum lot standards shall not apply where lots are required by a network utility operator or for a public work.	<ul style="list-style-type: none"> Support Standard 15.4.5.1

Plan change Provision	Support/Oppose/Amend	Submission/Reasons	Relief/Decision Sought
15.5 General Standards for Subdivision			
15.5.11 Subdivision in Relation to Infrastructure other than the National Grid	Support with amendment	First Gas seeks that Provision 15.5.11 be amended to include the upgrading, replacement and access of infrastructure – to be in line with the definition of 'Maintenance'.	<ul style="list-style-type: none"> Amend 15.5.11.1(1): 1. The ability to undertake maintenance, <u>upgrading, replacement</u>, and inspection of the infrastructure, <u>including access</u>, to avoid risk of injury and/or property damage; and
	Support	First Gas supports the requirement to demonstrate outcomes of consultation with the affected utility operator.	<ul style="list-style-type: none"> Retain 15.5.11.1.3
Chapter 17 – Network Utilities			
17.1 Resource Management Issues			
Issues 1,3	Support	The issues related to Regionally Significant Infrastructure and their functional and locational requirements are appropriately recognises in Issue 1 and 3.	<ul style="list-style-type: none"> Retain Issues 1 & 3
Issue 7	Support with amendment	First Gas generally supports Issue 7 but seeks that this issue also includes 'replacement'.	<ul style="list-style-type: none"> Amend Issue 7: The operation, maintenance, development, <u>replacement</u> and upgrade of Regionally Significant Infrastructure including the National Grid can be constrained by adverse effects from other activities.
Issue 8	Support	First Gas generally supports Issue 8 as Regionally Significant Infrastructure such as First Gas' assets are susceptible to reverse sensitivity effects.	<ul style="list-style-type: none"> Retain Issue 8
Issue 9	Support	First Gas supports the inclusion of an issue that recognises Regionally Significant Infrastructure supports the economic and social well-being of the district.	<ul style="list-style-type: none"> Retain Issue 9
17.2 Objectives and Policies			
Objective 17.2.1	Support with amendment	First Gas supports the intent of Objective 17.2.1 but considers the benefits need to be recognised not only where significant effects are avoided, remedied or mitigated.	<ul style="list-style-type: none"> Amend Objective 17.2.1 The benefits of the safe, efficient and effective operation (including

Plan change Provision	Support/Oppose/Amend	Submission/Reasons	Relief/Decision Sought
			maintenance, upgrade, replacement and development) of Regionally Significant Infrastructure including <i>Network Utilities</i> within the District are recognised. where significant adverse effects on the environment are avoided, remedied, or mitigated.
Policy 17.2.1.1	Support	First Gas supports recognising the functional requirements of <i>Network Utilities</i> .	<ul style="list-style-type: none"> Retain Policy 17.2.1.1
Policy 17.2.1.2	Support	First Gas supports placing equipment underground where it is technically and economically feasible.	<ul style="list-style-type: none"> Retain Policy 17.2.1.2
Policy 17.2.1.3	Support with amendment	First Gas generally supports Policy 17.2.1.3 but seeks that it be amended to ensure infrastructure has been suitably designed, as opposed to requiring a natural hazard assessment.	<ul style="list-style-type: none"> Amend Policy 17.2.1.3: Where network utility operators propose to locate within areas susceptible to natural hazards to meet a functional requirement, to ensure infrastructure has been adequately designed to require a natural hazard assessment so that the risks to and from the network utility can be appropriately managed <i>to the extent they are acceptable.</i>
Policy 17.2.1.4	Support with amendment	First Gas seeks that 'Regionally Significant Infrastructure' be included in Policy 17.2.1.4.	<ul style="list-style-type: none"> Amend Policy 17.2.14: Recognise the benefits of <i>Regionally Significant Infrastructure</i> and the National Grid in the District.
Policy 17.2.2.2	Support with amendment	First Gas supports having <i>Network Utilities</i> designed and located in a way that minimises adverse effects, but seeks that it be recognised that some infrastructure has functional and locational constraints.	<ul style="list-style-type: none"> Retain Policy 17.2.2.2 Ensure that <i>Network Utilities</i> including overhead lines, structures, and

Plan change Provision	Support/Oppose/Amend	Submission/Reasons	Relief/Decision Sought
			buildings are designed and located to seek to avoid or minimise adverse effects, particularly visual effects, <i>while recognising some infrastructure has functional and location constraints.</i>
Objective 17.2.3	Support with amendment	First Gas generally supports Objective 17.2.3	<ul style="list-style-type: none"> Retain Objective 17.2.3
Policy 17.2.3.1	Support with amendment	First Gas generally supports Policy 17.2.3.1, subject to sufficient protective provisions being provided for in the respective zone based provisions.	<ul style="list-style-type: none"> Retain Policy 17.2.3.1
Policy 17.2.3.2	Support	First Gas generally supports Policy 17.2.3.2.	<ul style="list-style-type: none"> Retain Policy 17.2.3.2
Chapter 17.3 – Activity Status			
17.3.1.1 Permitted Activities	Support with amendment	First Gas notes that the cross-reference appears to be incorrect, and should reference complying with the standards in Chapter 17.5 'Zone Standards', not 17.4 'Assessment Criteria for Restricted Discretionary Activities'.	<ul style="list-style-type: none"> Amend 17.3.1.1: Subject to compliance with the Standards in 47.4 <u>17.5</u> unless otherwise stated, the following activities may be established without resource consent.
17.3.1.2 Permitted Activities (All Zones)	Support with amendment	First Gas considers that maintenance, upgrading or replacement activities should not be required to comply with the zone based standards. Noting that 'minor upgrading' is exempt, First Gas seeks an amendment to this effect.	<ul style="list-style-type: none"> Amend Chapter 17.3.1.2: Maintenance, minor upgrading and replacement of lines and <i>Network Utilities</i>. Minor upgrading as defined in Chapter 19 is <i>These activities are</i> not required to comply with the Zone Standards.
17.3.1.2 Permitted Activities (All Zones)	Support with amendment	First Gas seeks that the permitted activities listed under Chapter 17.3.1.2 include activities in response to an emergency or disaster, or where there is considered that there could be a risk to life or property, and include activities to mitigate natural hazards to protect existing <i>Network Utilities</i> .	<ul style="list-style-type: none"> Amend Chapter 17.3.1.2: <u>4. In response to an emergency or disaster or where there is considered that there could be a risk to life or</u>

Plan change Provision	Support/Oppose/Amend	Submission/Reasons	Relief/Decision Sought
			<u>property.</u> <u>5. To mitigate natural hazards to protect existing Network Utilities</u>
17.3.3.2 (2) Restricted Discretionary Activities	Support with amendment	First Gas supports the inclusion of new Gas Transmission Pipelines as a restricted discretionary activity. However, it also seeks that incidental equipment also be provided for.	<ul style="list-style-type: none"> Amend Chapter 17.3.3.2: 2. Gas Transmission Pipelines, <u>including above ground and other incidental equipment</u>
Chapter 17.4 – Assessment Criteria for Restricted Discretionary Activities			
17.4.1(4) Assessment Criteria for Restricted Discretionary Activities	Support	First Gas supports the inclusion of Matter 4 in the matters of discretion listed in Chapter 17.4.1 as it recognises the benefits that can be derived from <i>Network Utilities</i> for the District.	<ul style="list-style-type: none"> Retain Matter 4 listed in Chapter 17.4.1.
17.4.1 Assessment Criteria for Restricted Discretionary Activities	Amend	First Gas seeks amendments in order to provide for <i>Network Utilities</i> to be located in areas where it has a functional requirement and to give consideration to instances where effort has been made to avoid, minimise, remedy or mitigate adverse environmental effects.	<ul style="list-style-type: none"> Add to 17.4.1: <u>7. The reasons for the proposed location, site or route or method, taking into account locational and functional requirements and constraints.</u> <u>8. The degree to which any adverse environmental effects have been sought to be avoided or minimised, or are to be remedied or mitigated.</u>
Chapter 17.5 – Assessment Criteria for Discretionary Activities			
17.5(13) Functional Requirements	Support	First Gas supports the notion of providing to Council the reasons why <i>Network Utilities</i> may need to be placed in certain locations, sites, or routes and relaying to Council the benefits of the utility to the community while also outlining what measures have been used to avoid, minimise, remedy or mitigate adverse environmental effects.	<ul style="list-style-type: none"> Retain Matter 13
Chapter 19 - Definitions			
Regionally Significant Infrastructure	Support	The proposed definition provides for First Gas's pipelines and incidental equipment as Regionally Significant Infrastructure and recognises that such infrastructure is critical to the functioning of the gas transmission (and distribution) system. Such incidental equipment includes delivery point stations.	<ul style="list-style-type: none"> Retain the definition of Regionally Significant Infrastructure
Maintenance, upgrading and replacement	Support	First Gas is a network utility operator and the proposed definition provides for work necessary to continue the operation and / or functioning of an existing network utility. The definition	<ul style="list-style-type: none"> Retain the definition of

Plan change Provision	Support/Oppose/Amend	Submission/Reasons	Relief/Decision Sought
		explicitly includes reference to 'pipes'.	Maintenance, upgrading and replacement (delete repetition of 'any work')
Replacement of network utility structures	Support	While supportive of the definition, First Gas questions the need for the definition over and above the definition of 'maintenance, upgrading and replacement' which provides for the same activity.	<ul style="list-style-type: none"> No specific relief sought
Gas Transmission Pipeline	Support	This definition is considered appropriate.	<ul style="list-style-type: none"> Retain the definition of Gas Transmission Pipeline
Functional Requirement	Support	The definition for 'functional requirement' provides context that Regionally Significant Infrastructure (in particular linear infrastructure) often has locational and operational constraints e.g. may traverse areas prone to natural hazards.	<ul style="list-style-type: none"> Retain the definition of Functional Requirement
Planning Maps			
Add Gas Transmission Pipeline to Planning Maps		<p>First Gas recommends that First Gas's assets which traverse the district be annotated on the District Plan Maps. The identification of significant infrastructure such as the gas transmission pipelines is important when considering applications for subdivision and / or development. Noting that many other district plans adopt this approach, First Gas considers it is an appropriate and effective way to alert third parties of the presence of the pipelines.</p> <p>Co-ordinates of the Gas Transmission Pipeline and incidental equipment can be provided on request.</p>	<ul style="list-style-type: none"> Add Gas Transmission Pipeline and above ground incidental equipment to Planning Maps