



2 September 2019

Plan Change 6 Submissions  
City Planning Unit  
Hamilton City Council  
Private Bag 3010  
**HAMILTON 3240**

By email: [districtplan@hcc.govt.nz](mailto:districtplan@hcc.govt.nz)

Dear Sir/Madam,

**SUBMISSION ON HAMILTON CITY COUNCIL'S PLAN CHANGE 6**

Please find attached submission by WEL Networks Limited on proposed Plan Change 6.

Please contact me for any matter related to the submission.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'K. Broughton'.

Karleen Broughton  
**COMMERCIAL LEGAL COUNSEL**

E-mail: [karleen.broughton@wel.co.nz](mailto:karleen.broughton@wel.co.nz)  
DDI: 850 3645

## **Submission by WEL Networks Limited on Proposed Plan Change 6**

### **Introduction**

WEL Networks Limited (“WEL”) is an electricity distributor operating under the Electricity Act 1992, who owns, operates and develops electricity distribution infrastructure in the Waikato Region to provide line function services to approximately 91,000 installation connection points. This includes the distribution of electricity to residences and businesses within Hamilton City.

WEL, as a network utility operator under the Resource Management Act 1991, has the responsibility of providing a secure and efficient supply of electricity to the community within WEL’s distribution network area.

### **Plan Change Purpose**

WEL acknowledges the purpose of the plan change is to make the District Plan more enabling and workable, and that the rules and methods framework of the District Plan were assessed in terms of their efficiency and effectiveness in meeting the Plan’s objectives and policies.

Council information outlines the methods implemented by Council in developing the plan change. It is disappointing that, despite WEL’s significant presence within Hamilton City as sole electricity distributor, there was no direct engagement with WEL.

Nonetheless, WEL generally supports the proposal as it will improve the effectiveness of the District Plan in enabling development. WEL wishes to ensure that its purpose in delivering a safe and reliable power supply is not adversely affected by the proposal.

### **Chapter 25.2 – Earthworks**

Council is proposing a change to *Chapter 25.2 – Earthworks* to include a new standard to ensure earthworks do not cause malfunction or result in the damage of network utilities. The wording of the new standard is as follows:

*g) Earthworks must not cause malfunction or result in damage to network utilities, or change the cover over network utilities so as to create the potential for damage or malfunction.*

WEL generally supports this new standard, as earthworks have the potential to damage network equipment. It is important to also understand that WEL has technical standards in terms of cable depth below the ground level. Even minor earthworks in the vicinity of a cable can potentially reduce this separation distance, resulting in a cable at a non-complying depth. Earthworks within proximity to network equipment must also comply with the requirements of the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP34).

WEL therefore proposes an amendment to standard g) to reflect these matters, as follows:

*g) Earthworks must not cause malfunction or result in damage to network utilities, or change the cover over network utilities so as to create the potential for damage or malfunction or non-compliance with the technical requirements of the network utility operator and/or any regulation or code applicable to the network utility.*

### **Future Plan Changes**

WEL requests that Council engages early with WEL on future plan change development. The opportunity to provide input during the development of the plan changes would be beneficial to all parties and promote an understanding of all utility requirements of the growing region.