

Attachment 4 to Report 01.322

Part 2

Draft Utilities and Services Policy Submissions

Submission US1



TC NOTE	INIT	DATE
B. Paul	BP	1/5/01
D. Atapattu		
AWE		
DSW	mlw	
ACTION		

WELLINGTON REGIONAL COUNCIL
- 1 MAY 2001

File: 6.2

30 April 2001

The General Manager
Wellington Regional Council
P O Box 11 646
WELLINGTON

Attention: Daya Atapattu

Dear Daya

HUTT RIVER DRAFT UTILITIES AND SERVICES POLICY

Thank you for your letter of 23 April 2001 with the draft policy proposal. Fish and Game supports your proposal as a sound and responsible approach to managing the integrity of your Council's river control infrastructure. Fish and Game is not, directly involved in the sense of owning any utility network structures, but we are indirectly involved because we benefit from the improved river channel stability that will arise from your policy.

Your Council's professional approach to the management of its river control responsibilities on the Hutt River is appreciated.

Yours faithfully

P H Hill
MANAGER

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Statutory managers of freshwater sports fish, game birds and their habitats

Wellington Region

188 Broadway Ave, PO Box 1325, Palmerston North, New Zealand. Telephone (06) 359 0409 Facsimile (06) 356 2780 e-mail fgman@manawatu.gen.nz

Submission US2



Please Quote Ref: LG/9/WRC
PB:GH07

4 May 2001

Mr Derek Wiltshire
Manager, Flood Protection
Wellington Regional Council
P O Box 11646
WELLINGTON

10	N/3/13/28	
B. Paul	BP	11/5/01
D. Wiltshire		
Days		

WELLINGTON REGIONAL COUNCIL
- 9 MAY 2001

Dear Derek

HUTT RIVER: DRAFT UTILITIES AND SERVICES POLICY

Please refer to your letter of 23 April 2001 regarding Hutt River Flood Plain Management Plan, draft utilities and services policy.

I would like to discuss your proposed policy with you. Transit and Wellington Regional Council currently have an agreement for the location of the highway in the Hutt River floodway. We need to discuss these draft policies for utilities as a change to the river works agreement, and then seek agreement of both authorities to a new agreement.

Please contact me to discuss this matter.

Yours faithfully

P. Bailey
ACTING REGIONAL MANAGER

Wellington Regional Office
Level 8 • Hewlett Packard House • 186-190 Willis Street • PO Box 27 477 • Wellington • New Zealand
Telephone 04 801 2580 • Facsimile 04 801 2599

2685

Submission US3



NATURAL GAS CORPORATION

NOTE	NIT	DATE
B. Paul	(B)	8/5/01
D. Wilshere		
AWL	(D)	
Dang		
ACTION		

Wellington
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1st May 2001

D Wilshere
Wellington Regional Council
P O Box 11-646
Wellington

WELLINGTON REGIONAL COUNCIL
- 3 MAY 2001

Dear Derek

Hutt River Floodplain Management Plan: Draft Utilities and Services Policy

Thank you for your letter dated 23 April 2001 on the above matter. It has been less than a week since receipt of your letter so we have been unable to give a lot of thought to your proposals. With the benefit of more time we could have considered the issues more fully.

Policy E1

There could be considerable debate as to whether the service in the stopbank caused the failure or the stopbank failed first on its own. That aside, the policy states that existing services will be removed but there is no mention of who pays or the cost benefits of such a move. The cost to the utility concerned and to the larger community of the considerable disruption to service seems to have been ignored.

Policy E2

This does not directly effect us.

Policy E3

Agreed. Utility owners need to have detailed understanding of timing, as considerable expenditure may need to be budgeted for with a long-term commitment required.

Policy E4

Agreed. Risk management measures, emergency response planning and contingency plans are all part of our everyday business functions.

Policy E5

This particular instance does not directly concern us but we are interested in the principles and will consider further.

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Policy N1

Generally new services can be planned to avoid flood defences but the river corridor itself is a much bigger barrier to avoid for utility operators. Alternatives may not always be possible, practical or cost effective to consumers of utility services.

Policy N2

You claim that by concentrating utility services at common points you minimise risk to flood defences. It could be argued that you actually increase risks from a lifelines perspective. Again it may not always be possible, practical or cost effective to comply with this proposed requirement.

Policy N3

This does not directly effect us.

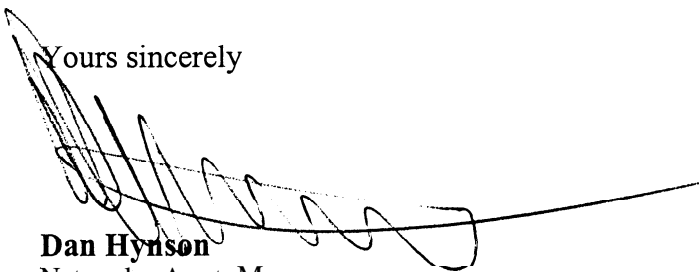
Policy 11

There will be individual issues unique to each utility that will have to be resolved one on one. However many issues are common to all utility operators and in the interests of co-ordination you may achieve more by discussing some issues through a body such as the Wellington Utility Operators Group.

Whilst we are concerned by some of your proposals, particularly the cost burden and how that is shared we understand what you are endeavouring to achieve and wish to continue to participate in this process by being kept informed of developments.

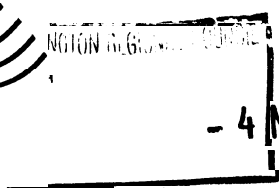
Please note a change in contact details again. The last for some time I hope.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Dan Hynson', written over a horizontal line.

Dan Hynson
Networks Asset Manager
Infrastructure Management Group

Submission US4



FILE NO	N13/13.2	
DATE	8/5/01	
BY	DSW	
TO	DSW	
TC ACTION		

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Wellington Regional Council
Flood Protection
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ATTENTION: Mr Alistair Cross

File: 308/7/2

2 May 2001

Dear Alistair

**SUBMISSION ON HUTT RIVER FLOODPLAIN MANAGEMENT PLAN
DRAFT UTILITIES AND SERVICES POLICY**

I refer to your draft Policy dated 23 April 2001 and thank you for the opportunity to make a submission on your proposals. My comments are as follows:

Existing services:

- Policy E1:

The statement is made that existing services will be removed from stopbanks and relocated where possible outside the river corridor during stopbank, river corridor or service upgrading.

As previously advised, we cannot agree with this policy for the essential services of water, sewerage and stormwater. In places the water supply and water reticulation have to cross the stopbanks to service developed areas on the other side of the river. There are also sewerage system emergency overflows that we have no option but to discharge through the stopbank into the river.

- Policy E2:

Given the layout of stormwater outlets in Upper Hutt rationalisation is probably not a concern. However, if it were, the feasibility of achieving rationalisation and the cost of it would have to be measured against the benefits, if any that would be obtained. Under your explanation for Policy 2 your second bullet point refers to sewerage outlets and your last bullet point to opportunities for stormwater pumping which would benefit large areas. I have referred to the need for sewerage outlets as emergency overflows above. The reference to stormwater pumping benefiting larger areas needs further explanation of the benefits. I believe that both policies E1 and E2 do not consider the complexities of the local stormwater and sewerage reticulation. They are essentially drained by gravity rather than by pumping which limits the alignment and location of pipes, pump stations are avoided if possible because of the cost of running them and the consequences of failure. Stormwater outlets with flap gates have areas behind them for ponding of local run-off which would be complicated if several outlets were brought together. Most stormwater systems within New Zealand city's would be under-capacity for current conditions and

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rationalising outlets is only likely to exacerbate the up stream problems.

- Policy E3:

Policy E3 states that Hutt River Floodplain Management Plan assets are constructed to provide flood protection and that any protection benefit to utilities or services is secondary. I would point out that both the Wellington Regional Council and the Upper Hutt City Council serve the same people. I am sure that those people would expect all of their assets to be adequately protected. The last bullet point under your explanation refers to providing a higher level of protection if desired. That statement raises the question of what level of protections you are providing as part of your river management. For example the level of protection for floodbanks is the 2300 cumec flood. Would this same level of protection apply to services within the river corridor?

- Policy E4”

I agree with the policy but under the explanation second bullet point it cannot be stated that the community has indicated that it requires key utility network facilities in the river corridor be protected to a 1900 cumec standard. Non structural measures will be part of District Plan processes and that has not commenced.

- Policy E5: No comment.

New services:

- Policy M 1. No comment.

- Policy M2.

Provided there is flexibility in choosing crossing points and due consideration is given to the design constraints and costs of the services being provided, then I have no further comment on Policy M2.

- Policy M3.

The policy states that stormwater outlets “should” be rationalised. Provided this flexibility is retained and due consideration is given to the design and cost constraints of the local reticulations, I have no further comment. Your reference in the last bullet point under explanation to opportunities for stormwater pumping which would benefit larger areas, again needs further explanation of the benefits.

Implementation:

- Policy I1. No comment.

Yours faithfully



Lachlan Wallach
DIRECTOR, OPERATIONS

Submission US5

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T R A N S P O W E R

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2 May 2001

Derek Wilshire
Flood Protection Group
Wellington Regional Council
PO Box 11646
Wellington

Dear Derek

Hutt River Floodplain Management Plan: Draft Utilities and Services Policy

Thankyou for your letter of 23rd April 2001, requesting Transpower's feedback on the updated draft Hutt Floodplain Utilities and Services Policy.

Transpower is pleased to note that the current draft Services and Utilities policies makes provision for the continued operation of Melling substation in its present location. As the Hutt Floodplain Management Plan will impact on Transpower's operations at Melling, we request the opportunity to provide further input, as the development of these policies and the Hutt River Floodplain Management Plan continues.

Yours sincerely
TRANSPOWER NEW ZEALAND LIMITED



Caroline Horrox
Environmental Advisor

N/3/13/28		
NAME	INIT	DATE
B. Paul	BP	11/5/01
D. Wilshire		

- 9 MAY 2001

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Hutt River Floodplain Management Plan: Draft Utilities and Services Policy

Transpower would like to make the following comments on the above draft policy:

Use of the terms 'Services' and 'Utilities'

The inclusion of both the terms 'Services' and 'Utilities' in the policy document would indicate that the two terms refer to two different things. Some of the policies refer to 'Services' only and some to 'Utilities' only. Some policies refer to 'Services' in the Policy statement, and then talk about Service and Utilities in the Explanation. The meanings of these terms need to be defined and their use consistent. As it stands, it is difficult to determine whether a particular policy applies to Transpower's Melling substation or not. Other service and utility providers will probably also have these difficulties.

Transparency of policy development

Some of the current draft Utilities and Services Policies differ quite significantly from the policies in the previous version. Some policies are completely new and some of the previous policies have been removed. This makes it difficult to follow the development of some policies from the initial version to the current version. For example, the issue of service relocation costs is now not mentioned at all. It is assumed that this issue has not gone away, and it would be useful to know how the Council now proposes to deal with this issue.

Therefore it would be helpful if the Council provided more information on the feedback it received on the policies, the Council's response, and the reasons/logic behind subsequent alterations to policies.

Policy Purpose and Responsibilities

Transpower's agrees that transparency is required in expectations of the management of the floodplain – this will help utility operations like Transpower to plan future maintenance and upgrade works. It is also agreed that utility owners need to be consulted early on in the process should the Council propose flood protection upgrade works or utility owners plan for utility upgrading works.

Proposed Principles

Policy E.1 Existing services will be removed from Stopbanks and relocated where possible outside the river corridor during stopbank, river corridor or service upgrading.

Transpower's comments

Transpower understands that the existence of Policy E.5 means that Policy E.1 does not apply to Transpower's Melling assets.

Policy E.2 The number, location and design of stormwater outlets should be rationalised during stopbank or service upgrading

Transpower's comments

No comments

- **Policy E.3 The HRFMP assets are constructed to provide flood protection. Any protection benefit to utilities or services is secondary unless by individual agreement with the service owner**

Transpower's comments

As the explanation for this policy indicates, the purpose of the HRFMP assets is to provide flood protection for the community. The meaning of 'community' is not defined. However it is assumed that the Council's definition of community excludes utilities and services, as the policy explicitly excludes them from HRFMP asset flood protection.

This seems paradoxical considering that services and utilities are an integral part of the community on which the day to day functioning of the Hutt district relies. Furthermore, Transpower's infrastructure (transmission lines and substation) are significant physical resources in terms of the Resource Management Act 1991 (the Act). It is consistent with the purpose of the Act to promote sustainable management of such physical resources. Accordingly, any adverse effects on the identified transmission lines must be avoided, remedied or mitigated. Furthermore, Transpower believes that as Melling substation was established through a lawful process, it should not be penalised for being situated on the floodplain.

Transpower is primarily responsible for flood mitigation at the Melling site and is committed to the implementation of a long-term flood mitigation strategy for Melling substation, as the Wellington Regional Council is aware. However it seems the deliberate exclusion of utilities and services from flood protection does not provide the best protection of the community's interests. On the contrary, complete exclusion of utilities and services located within the floodplain, from consideration during structural flood protection planning, may potentially exacerbate flooding impacts.

For these reasons, it seems logical that the planning of major structural flood protection works (eg. realigning the stopbank) should incorporate some consideration of how such works may effect existing lawfully established services/utilities such as Melling substation, and whether their protection could be enhanced.

- Policy E.4 Key utility facilities should be protected to a 1900 cumec standard and have contingency plans to cope with the loss of the service in a major flood**

Transpower's comments

The overall strategy for the Melling site is the implementation of flood mitigation to generally provide for a flow rate of 2800 cumecs.

- Policy E5 The Melling substation is a special case and arrangements for maintaining and up grading these assets within the River Corridor have been agreed with the owner**

Transpower commends the Wellington Regional Council's decision to recognise the unique circumstances of the Melling infrastructure and is pleased that its previous comments on this matter are reflected in the current draft Services and Utilities policy document.

Transpower understands that the Services and Utilities policies will guide the development of more specific tools (e.g. rules) for managing services and utilities within the flood plain. It is therefore imperative that this policy's intent is carried through into the specific strategies and rules formulated by the Wellington Regional Council and by the Hutt and Upper Hutt City

- Councils (who are expected to pick up the day to day responsibility for the floodplain management in the future).

Policy N1 Services along the River Corridor:
New Services will not be located in or under a stopbank. New Services will be located in other areas of the river corridor (excluding stopbanks) only with the prior approval of the Wellington Regional council

Transpower's comments

Transpower understands that the existence of Policy E.5 means that Policy N.1 does not apply to Transpower's Melling assets.

Policy N2 Services crossing the River Corridor:
Services will cross the river at approved or designated service crossings

Transpower's comments

Transpower's Haywards - Melling B transmission line (HAY-MLG B) crosses the Hutt River adjacent to Melling substation. Transpower has not received any comment from the Council regarding the location of this line crossing and thus assumes that the Council has no issue with its present location.

HAY - MLG B tower 31 is currently located close to the Hutt River, within the 80m primary erosion zone. In the long term, works may be initiated to improve the protection of this tower (via relocation or reinforcement).

Policy N3 The number; location and design of stormwater outlets should be rationalised when new stormwater system are needed

Transpower's comments

No comments

Policy I. 1 An individual agreement will be negotiated with each identified service owner during the design phase of each major HRFMP project, service upgrade or new service installation

Transpower's comments

Transpower supports early consultation between the Wellington Regional Council and utility/ services providers when the Council is planning major HRFMP projects and when utility providers are planning to upgrade.

Submission US6

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caring about you & your environment

MEMORANDUM

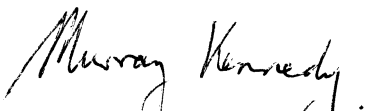
10 May 2001
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To: Derek Wilshere
From: Murray Kennedy, Strategy & Asset Manager
Subject: Hutt River Flood Plain Management Plan: Draft Utilities and Services Policy
For Your: **Action** [] **Comment** [] **Information** []

In your letter of 23 April you asked us to comment on your updated Draft Services Policy. This is policies E1 to E5, N1 to N3 and II.

Of particular interest to the Water Group is policy N2 which covers the services crossing the river corridor. This policy generally meets the issues raised in correspondence with you. I would comment though, that because of the diameter of the Water Group's pipes, they are likely to have to pierce through the stopbank, rather than follow the contour over the top.

We are only considering one new river crossing in the foreseeable future, and this can be at a designated service crossing which will agreed with you at the time.


MD KENNEDY
Strategy and Asset Manager