Submission by WEL Networks Limited on Proposed Plan Change 12 of the Hamilton City District Plan – Growing Up

Part A – Introduction

WEL Networks Limited

WEL Networks Limited ("WEL") is an Electricity Distributor operating under the Electricity Act 1992, which owns, operates and develops electricity distribution infrastructure in the Waikato Region to provide line function services to approximately 98,098 installation connection points. This includes the distribution of electricity to many residences and businesses within Hamilton City.

WEL owns and manages utilities within the road reserve (both overhead and underground), owns sites which contain substations and/or switching stations and has utilities authorised by easements within private land (usually overhead lines, underground cables and distribution transformers).

WEL, as a network utility operator under the Resource Management Act 1991 ("RMA"), has the responsibility of providing a secure and efficient supply of electricity to the community within WEL's distribution network area. WEL's network of cables and lines allows every household, business, school, medical facility and other types of consumers to have access to electricity. Other infrastructure such as substations, switching stations, ring main units, transformers, service pillars and pillar boxes allow WEL to convert electricity from a higher voltage (taken from the national grid) to a useable voltage for consumers to access, and to provide an enhanced level of security of supply through built-in redundancy in the network. WEL is classified as a lifeline utility under the Civil Defence Emergency Act 2002 and is also a requiring authority under the RMA.

More recently, WEL's generation subsidiary, has been investing in generation and storing of electricity across our distribution network to help support New Zealand's journey towards a cleaner energy future. One battery project has been consented and two solar farms have been submitted for resource consent. WEL also has several projects involving installing commercial scale solar on rooftops and installing electric vehicle charging stations within Hamilton City.

WEL Energy Trust

WEL has one shareholder, the WEL Energy Trust ("Trust"), which is a community-owned trust that represents and acts in the interests of the communities of the Waikato Region. The capital beneficiaries of the Trust are the Hamilton City Council, Waikato District Council, and Waipa District Council.The Trust was formed in 1993 and will be wound up in 2073 (unless terminated sooner). Thereafter, WEL will be owned by the Hamilton City, Waikato District, and Waipa District Councils.

Part B - WEL's Submission on Proposed Plan Change 12 of the Hamilton City District Plan – Growing Up ("Plan Change")

The purpose of the Plan Change is to enable Hamilton City Council ("Council") to meet its obligations as a Tier 1 Council under the National Policy Statement on Urban Development ("NPS-UD") and Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 ("Amendment Act").

WEL's electricity infrastructure supports the sustainable management and efficient use of natural and physical resources as promoted in Part 2 of the RMA.

A fundamental part of enabling people and communities to provide for their social, economic and cultural wellbeing under section 5 of the RMA is the provision of a secure and efficient supply of electricity and telecommunications.

The benefits of WEL's electricity infrastructure in achieving sustainable management are also enshrined in the RMA through sections 7(b) and 7(ba); in achieving the purpose of the RMA, particular regard is to be given to "the efficient use and development of natural and physical resources" and "the efficiency of the end use of energy".

Intensification

In recent years there has been significant intensification of existing residential areas and in the vicinity of the Central Business District ("CBD"). Intensification of these areas is expected to increase further through Council's response to the NPS-UD which will enable residential growth around the CBD and other centres of economic or social activity and well as other residential areas.

To meet the projected growth, WEL and its subsidiary are introducing new projects to meet demand while maintaining security levels. The new projects will include the following:

- New network infrastructure to be installed throughout Hamilton, in particular, in the transport corridors, to meet the anticipated growth.
- Upgrading existing network infrastructure to meet load demand and increase resilience.
- Renewable generation and storage projects to increase the capacity of renewable energy generation to supply the community.

Overall, WEL generally supports the Plan Change to capture the needs of the community. However, WEL wishes to ensure that its purpose in delivering a safe and reliable power supply is recognised and provided for in the Plan Change document. In addition, WEL wishes to ensure that development enabled by the NPS-UD can be supplied with electricity in a timely and cost-efficient manner.

Scope for Plan Change to Include Provisions Related to Infrastructure

Relevant provisions

Section 80E of the Amendment Act provides for the meaning of an intensification planning instrument, as follows:

80E Meaning of intensification planning instrument
(1) In this Act, intensification planning instrument or IPI means a change to a district plan or a variation to a proposed district plan—
(a) that must—
(i) incorporate the MDRS; and
(ii) give effect to,—
(A) in the case of a tier 1 territorial authority, policies 3 and 4 of the NPS-UD; or
(B) in the case of a tier 2 territorial authority to which regulations made under section 80I(1) apply, policy 5 of the NPS-UD; or
(C) in the case of a tier 3 territorial authority to which regulations made under section 80K(1) apply, policy 5 of the NPS-UD; and
(b) that may also amend or include the following provisions:
(i) provisions relating to financial contributions, if the specified territorial authority chooses to amend its district plan under section 77T:
(ii) provisions to enable papakāinga housing in the district:
(iii) related provisions, including objectives, policies, rules, standards, and zones, that support or are consequential on—
the MDRS; or
(B) policies 3, 4, and 5 of the NPS-UD, as applicable.

(2) In subsection (1)(b)(iii), related provisions also includes provisions that relate to any of the following, without limitation:
(a) district-wide matters:
(b) earthworks:
(c) fencing:
(d) infrastructure:
(e) qualifying matters identified in accordance with section 77I or 77O:
(f) storm water management (including permeability and hydraulic neutrality):
(g) subdivision of land.

Part 3 clause 3.5 of the NPS-UD requires local authorities to be satisfied that the additional infrastructure to service the development capacity is likely to be available. It is noted that a network operated for the purpose of transmitting or distributing electricity falls within the definition of additional infrastructure.

Qualifying matters in s770 of the RMA specifically include matters required for the purpose of ensuring the safe or efficient operation of nationally significant infrastructure (renewable electricity generation facilities that connect with the national grid) and matters required to give effect to a national policy statement, including the National Policy Statement for Renewable Energy Generation.

Plan Change Provisions

The Amendment Act requires the Plan Change to incorporate the Medium Density Residential Standards ("MDRS") and to give effect to policies 3 and 4 of the NPS-UD. The Plan Change may also amend or include related provisions including provisions that relate to infrastructure, and new and existing qualifying matters.

Infrastructure as defined in the RMA covers both the generation and distribution of electricity (facilities for the generation of electricity, lines used or intended to be used to convey electricity, and support structures for lines used or intended to be used to convey electricity as well as anything described as a network utility operation in regulations made for the purposes of the definition of network utility operator in section 166).

Accordingly, the Plan Change is able to include provisions related to infrastructure where these are consequential on the MDRS and to give effect to policies 3 and 4 of the NPS-UD. Intensification as enabled under the Amendment Act:

- Increases the number of buildings, structures and people adjacent to electricity infrastructure. This increases the risk of unsafe environments, which need to be adequately addressed in the Plan Change.
- Places a burden on the capacity of existing infrastructure. This means that additional capacity needs to be enabled by the Plan Change in order to adequately cater for growth.

Safety Concerns

Section 34 of the Electrical Code of Practice ("NZECP 34:2001") sets the minimum safe distances between buildings (and other structures) and electricity infrastructure, and addresses matters such as excavation near overhead electric line supports (among other matters). Ensuring safety around assets is a paramount priority for WEL and we wish to avoid serious safety outcomes which may result from development located too closely to existing infrastructure.

Separately, WEL is already seeing examples of how intensification is affecting existing electricity infrastructure with entranceways/driveways being created in unsafe locations in the vicinity of overhead infrastructure. WEL's requirements for separation between existing infrastructure and the development of entranceways/driveways is not well understood or known by developers and consent holders.

Likewise, failure to adequately provide for electricity infrastructure and vegetation plantings in berms created as part of new development increases the risk of unsafe environments as well as affecting WEL's ability to operate and maintain its infrastructure.

In this submission, WEL is seeking that NZECP 34:2001 be complied with as well as the setback standards. WEL also seeks that vegetation and berm provisions adequately provide for network utilities.

Clean Energy Maximisation Infrastructure

The National Policy Statement for Renewable Energy Generation contains one objective that states; '*To recognise the national significance of renewable electrical generation activities by providing for the development, operation, maintenance and upgrading of new and existing renewable electricity generation activities, such that the proportion of New Zealand's electricity generate from renewable energy sources increases to a level that meets or exceeds the New Zealand Government's national target for renewable electricity generation'.*

As the country moves towards a higher capacity of renewable energy, WEL's generation subsidiary continues to explore ways in which renewable electricity can be distributed/utilised, maximised and generated to supply the development anticipated through the NPS-UD and with a source of renewable energy generation. Increased intensification requires additional power capacity as well as an increased density of supporting infrastructure, for example, transformers, switchgear and cables as well as vehicle charging points. It is critical that the Plan Change adequately enables renewable power generation and provides for infrastructure to support intensification.

Relief Sought

WEL submits that the Plan Change fails to adequately include provisions for electricity distribution and renewable energy generation infrastructure which support or are consequential on the MDRS or to give effect to policies 3 and 4 of the NPS-UD. Accordingly, WEL requests amendments to the Plan Change to:

- Ensure the importance of network utilities in enabling growth, is recognised.
- Ensure networks utilities are not adversely affected by development.
- Ensure sufficient space within the road berm for network utilities and other infrastructure.
- Efficiency gains from common utility corridors and trenches.
- Enable renewable energy, as it will assist in supplying electricity to development anticipated by

NPS-UD.

- Ensure vegetation in the vicinity of network utilities is appropriately chosen and planted.
- Ensure network utilities development within Historical Heritage Areas is not inappropriately restricted.

The reasons for these changes and the specific relief sought by WEL to address its concerns are set out in the table below. If the specific relief is not accepted by Council, WEL alternatively requests that appropriate amendments be made to the provisions to give effect to the concerns raised by WEL.

Individual Submission Points

The following table summarises each submission point and notes whether WEL supports, supports in part or opposes, and the relief sought. Additions are <u>underlined</u> and in *italics*.

Specific provision	**WEL's Submission**	**Revision sought (if any)**
Chapter 19 – Historical Heritage		
19.4.3 Historic Heritage Areas - Site Coverage Activity a. Front, corner or through sites (maximum % unless otherwise stated) 35%	WEL **opposes** Rule 19.4.3a which provides for a site coverage of 35% in Historical Heritage Areas ("HHA"). WEL submits that the site coverage rules remain at the current General Residential Zone standard of 40%. Plan Change 9 introduced HHA throughout Hamilton over existing General Residential Zoned properties. The Plan Change will enable intensification of the General Residential Zone except in the vicinity of a HHA where intensification is generally not permitted without a resource consent. It is unclear why Council is proposing to restrict site coverage by 5% instead of relying on the current General Residential Zone standards, as intensification is already restricted by the HHA overlay.	That Council **amends** Rule 19.4.3a, as follows: Activity Front, corner or through sites (maximum % unless otherwise stated) ~~35~~*40*% …
19.4.4 Historic Heritage Areas - Permeable Surface and Planting Activity a. Permeability across the entire site (including area required by Rule 19.4.5.b below) (minimum % unless otherwise stated) 40% b. Front sites, corner sites, through sites only: front setback (required by Rule 19.4.8 Building Setbacks)	WEL **opposes** Rules 19.4.4a and 19.4.4b which provides for permeability across the entire site at 40% and permeability of front sites at 80% in HHA. Currently the Residential Zone of the District Plan provides for permeability across the entire site at 30% and permeability of front sites at 50%. Plan Change 9 introduced HHA throughout Hamilton over existing General Residential Zoned properties. The Plan	That Council **amends** Rules 19.4.4a and 19.4.4b, as follows: Activity a. Permeability across the entire site (including area required by Rule 19.4.5.b below) (minimum % unless otherwise stated) ~~40~~*30*% b. Front sites, corner sites, through sites only: front setback (required by Rule 19.4.8 Building Setbacks) to

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to be planted in grass, shrubs or trees (see Figure 19.4.5) 80%	Change will enable intensification of the General Residential Zone except in the vicinity of a HHA where intensification is generally not permitted without a resource consent. It is unclear why Council is proposing to restrict site permeability by 10% and front site permeability by 30% instead of relying on the current General Residential Zone standards, as intensification is already restricted by the HHA overlay.	be planted in grass, shrubs or trees (see Figure 19.4.5) ~~80~~*50*%
19.4.5 Historic Heritage Areas - Building Height Activity a. Front, corner and through site (maximum height unless otherwise stated) HAA - except Temple View HHA All buildings shall have a maximum height of: i. The original height of the building on the subject site; or ii. The average of existing heights of buildings on adjacent sites, being the three sites on either side of the subject site or six sites on one side of the subject site Whichever is higher	WEL **opposes** Rule 19.4.5a which provides for building height in HHA. WEL is requesting that the building height rules reflect the rear height HHA standard of 8m. It is noted that the current height of the General Residential Zone provides for buildings of 10m. Plan Change 9 introduced HHA throughout Hamilton over existing General Residential Zoned properties. The Plan Change will enable intensification of the General Residential Zone except in the vicinity of a HHA where intensification is generally not permitted without a resource consent. It is unclear why Council is proposing to restrict the building height for front sites, as intensification is already restricted by the HHA overlay.	That Council **amends** Rule 19.4.5a, as follows: Activity a. Front, corner and through site (maximum height unless otherwise stated) HAA - except Temple View HHA All buildings shall have a maximum height of: i. ~~The original height of the building on the subject site; or~~ *8m* ~~ii. The average of existing heights of buildings on adjacent sites, being the three sites on either side of the subject site or six sites on one side of the subject site~~ ~~Whichever is higher~~
19.4.7 Historic Heritage Areas - Building Setbacks Activity	WEL **opposes** Rule 19.4.7a which provides for a front boundary setback in HHA. Currently the Residential Zone of the District Plan provides for a front boundary setback of 3m.	That Council **amends** Rule 19.4.7a, as follows: Activity

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a. From a boundary with - any transport corridor (minimum setback unless otherwise stated) HHA Except for Temple View HHA, all HHAs: All buildings shall be set back from the boundary the greater of: i. The front setback of the original building on the subject site; or ii. The average of existing front setback of buildings on adjacent sites, being the three sites on either side of the subject site or six sites on one side of the subject site.	Plan Change 9 introduced HHA throughout Hamilton over existing General Residential Zoned properties. The Plan Change will enable intensification of the General Residential Zone except in the vicinity of a HHA where intensification is generally not permitted without a resource consent. It is unclear why Council is proposing to restrict the building front boundary setbacks, intensification is already restricted by the HHA overlay.	From a boundary with - any transport corridor (minimum setback unless otherwise stated) HHA Except for Temple View HHA, all HHAs: All buildings shall be set back from the boundary ~~the greater of~~: i. *3m* ~~The front setback of the original building on the subject site; or~~ ~~ii. The average of existing front setback of buildings on adjacent sites, being the three sites on either side of the subject site or six sites on one side of the subject site.~~
Chapter 23 - Subdivision		
23.2 Objectives and Policies: Subdivision Objective 23.2.2 Subdivision contributes to the achievement of functional, attractive, sustainable, safe and well designed environments. Policy 23.2.2a Subdivision: i. Is in general accordance with Subdivision Design Assessment Criteria to achieve good amenity and design outcomes. ii. Is in general accordance with any relevant Structure Plan.	WEL requests that Policy 23.2.2a is **amended** to ensure that it is demonstrated that building platforms can be located in positions where a subsequent building can comply with the NZ Electrical Code of Practice for Electrical Safe Distances ("NZECP 34:2001"). Further WEL request that the policy be amended to ensure that vegetation to be planted in the vicinity of electricity infrastructure be selected and/or managed so that it does not breach the Electricity (Hazards from Trees) Regulations 2003 ("Tree Regs"). Through the intensification of Hamilton and the reduction of setbacks from the transport corridor, there is potential for future development to be located in positions which may breach NZECP 34:2001. The amended policy will ensure that	That Council **amends** Policy 23.2.2a, as follows: Policy 23.2.2a Subdivision: i. Is in general accordance with Subdivision Design Assessment Criteria to achieve good amenity and design outcomes. ii. Is in general accordance with any relevant Structure Plan. iii. Is in general accordance with any relevant Integrated Catchment Management Plan. v. Promotes energy, water and resource efficiency. vi. Provides for the recreational needs of the community.

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iii. Is in general accordance with any relevant Integrated Catchment Management Plan. v. Promotes energy, water and resource efficiency. vi. Provides for the recreational needs of the community. vii. Discourages cross-lease land ownership. viii. Ensures that any allotment is suitable for activities anticipated for the zone in which the subdivision is occurring. ix. Contributes to future residential development being able to achieve densities that are consistent with the growth management policies of the Waikato Regional Policy Statement and Future Proof. x. Avoids or minimises adverse effects on the safe and efficient operation, maintenance of and access to network utilities and the transport network. xi. Is avoided where significant adverse effects on established network utilities or the transport network are likely to occur. xii. Promotes connectivity and the integration of transport networks. xiii. Provides appropriate facilities for walking, cycling and passenger transport usage. xiv. Provides and enhances public access to and along the margins of the Waikato River and the City's lakes, gullies and rivers. xv. Facilitates good amenity and urban design outcomes by taking existing electricity transmission infrastructure into account in subdivision design, and where possible locating compatible activities such as	a compliant building platform can be provided.	vii. Discourages cross-lease land ownership. viii. Ensures that any allotment is suitable for activities anticipated for the zone in which the subdivision is occurring. ix. Contributes to future residential development being able to achieve densities that are consistent with the growth management policies of the Waikato Regional Policy Statement and Future Proof. x. Avoids or minimises adverse effects on the safe and efficient operation, maintenance of and access to network utilities and the transport network. xi. Is avoided where significant adverse effects on established network utilities or the transport network are likely to occur. xii. Promotes connectivity and the integration of transport networks. xiii. Provides appropriate facilities for walking, cycling and passenger transport usage. xiv. Provides and enhances public access to and along the margins of the Waikato River and the City's lakes, gullies and rivers. xv. Facilitates good amenity and urban design outcomes by taking existing electricity transmission infrastructure into account in subdivision design, and where possible locating compatible activities such as infrastructure, roads or open space under or in close proximity to electricity transmission infrastructure. xvi. Ensures that a compliant building platform can be accommodated within the subdivided allotment outside of the National Grid Yard.

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infrastructure, roads or open space under or in close proximity to electricity transmission infrastructure. xvi. Ensures that a compliant building platform can be accommodated within the subdivided allotment outside of the National Grid Yard.		*<u>xvii. In the vicinity of electricity infrastructure demonstrates that building platforms can be located in positions where a subsequent building can comply with the NZ Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001).</u>* *<u>xviii. Ensures that vegetation to be planted in the vicinity of electricity infrastructure be selected and/or managed so that it does not breach the Electricity (Hazards from Trees) Regulations 2003.</u>*
23.3 Rules – Activity Status Tables a.iv. Subdivision to accommodate a network utility service or transport corridor - RD in the General Residential, Medium Density Residential and High Density Residential. c.iv. Subdivision to accommodate a network utility service or transport corridor – RD in the Peacock Character Zone. d.iii. Subdivision to accommodate a network utility service or transport corridor – RD in the Rotokauri North Residential Precinct.	WEL **supports** Rules 23.3.a.iv, 23.3.c.iv and 23.3.d.iv as they enable subdivision to a accommodate a network utility as a Restricted Discretionary Activity.	That Council **retains** Rules 23.3iv, 23.3iv and 23.3iv, as notified.
23.6 Rules – Specific Standards Include a new standard 23.6.7.	WEL requests that a **new** standard be included as 23.6.7. The standard will give effect to Policy 23.2.2a. The standard is proposed to ensure that any subdivision	That Council includes a **new** standard**,** as follows: *<u>23.6.7 Subdivision Activities adjacent Electricity Distribution Infrastructure</u>*

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	demonstrates that building platforms can be located in positions where a subsequent building can comply with the NZECP 34:2001. Further WEL request that the standard be amended to ensure that vegetation to be planted in the vicinity of electricity infrastructure be selected and/or managed so that it does not breach the Tree Regs. Through the intensification of Hamilton and the reduction of setbacks from the transport corridor, there is potential for future development to be located in positions which may breach NZECP 34:2001. The proposed standard will ensure that a compliant and safe building platform can be provided.	 *Any subdivision in the vicinity of electricity infrastructure must demonstrate that building platforms can be located in positions where a subsequent building can comply with the NZ Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001).* *Vegetation to be planted in the vicinity of electricity infrastructure should be selected and/or managed so that it does not breach the Electricity (Hazards from Trees) Regulations 2003.*
23.7.2 Subdivision Suitability b. The standards of Rule 23.7. shall not apply to the subdivision of land to accommodate a network utility service.	WEL **supports** Rule 23.7.2b as the rule excludes network utility allotments from complying with the standards included in section 23.7.	That Council **retains** Rule 23.7.2b, as notified.
25.14 Transportation		
25.14.2 Objectives and Policies: Transportation Climate Change Policy 25.14.2.1b Promote the establishment and maintenance of a continuous tree canopy along transport corridors to improve amenity for corridor users and adjoining land use, minimise the urban heat island effects of urban intensification, enhance biodiversity and ecological	WEL **supports in part** Policy 25.14.2.1b. However, WEL requests that the policy is amended to ensure that the vegetation to be planted in the vicinity of electricity infrastructure is selected and/or managed so that it does not breach the Electricity (Hazards from Trees) Regulations 2003. The requested amendment would be consistent with Objective 18.2.4 and Policy 18.2.4a which seeks to enable non-network utility activities provided they do not	That Council **amends** 25.14.2.1b**,** as follows: Climate Change Policy 25.14.2.1b Promote the establishment and maintenance of a continuous tree canopy along transport corridors to improve amenity for corridor users and adjoining land use*, and to* • minimise the urban heat island effects of urban

Specific provision	WEL's Submission	Revision sought (if any)
function, provide summer shade to make the corridors more comfortable for walking, cycling, and micro-mobility during hotter weather, and store carbon.	compromise the function, safety and efficiency of the transport corridor, and the provision and operation of network utility infrastructure.	intensification, • enhance biodiversity and ecological function, • provide summer shade to make the corridors more comfortable for walking, cycling, and micro-mobility during hotter weather, and store carbon. *<u>Provided that the vegetation to be planted in the vicinity of electricity infrastructure be selected and/or managed so that it does not breach the Electricity (Hazards from Trees) Regulations 2003.</u>*
Parking Policy 25.14.2.1h Manage the design, location, quantity, and pricing of any parking infrastructure provided in a way that: … E. Provides charging facilities for electric powered vehicles and micromobility devices.	WEL **supports in part** Policy 25.14.2.1hE. However, WEL requests the inclusion of associated electricity infrastructure that supplies the charging facilities, which is an essential function to their operation.	That Council **amends** Policy 25.14.2.1hE, as follows: Parking Policy 25.14.2.1h Manage the design, location, quantity, and pricing of any parking infrastructure provided in a way that: … E. Provides charging facilities for electric powered vehicles *<u>and associated electricity infrastructure</u>* and micromobility devices.
Biodiversity in the Transport Corridors Policy 25.14.2.1q Encourage the planting, retention, and maintenance of indigenous trees and vegetation within transport corridors, where appropriate, to recognise and reflect	WEL **supports in part** Policy 25.14.2.1q. WEL requests that the policy is amended to ensure that the vegetation to be planted in the vicinity of electricity infrastructure be selected and/or managed so that it does not breach the Electricity (Hazards from Trees) Regulations 2003.	That Council **amends** Policy 25.14.2.1q, as follows: Biodiversity in the Transport Corridors Policy 25.14.2.1q

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ecological, amenity, cultural, and landscape values and to support the establishment and enhancement of ecological corridors.		Encourage the planting, retention, and maintenance of indigenous trees and vegetation within transport corridors, where appropriate <u>*and*</u> ~~-~~<u>*provided it does not interfere with network utilities,*</u> to recognise and reflect ecological, amenity, cultural, and landscape values and to support the establishment and enhancement of ecological corridors.
25.14.4 Rules – General Standards 25.14.4.2b Electric Vehicle Charging a. All new residential activities with on-site vehicle parking must provide an electric vehicle charging point for each vehicle parking space provided. Note An electric vehicle charging point excludes the charging cable that connects between a residential unit's electrical outlet and the electric vehicle. The owner or driver of the electric vehicle is expected to provide this.	WEL **supports in part** Rule 25.14.4.2b which requires new residential activities to provide an electric vehicle charging point for each vehicle parking space provided. However, WEL submits that one vehicle charging point per parking space is excessive and not required. WEL considers that one vehicle charging point per dwelling is reasonable.	That Council **amends** Rule 25.14.4.2b, as follows: 25.14.4.2b Electric Vehicle Charging a. All new residential activities with on-site vehicle parking must provide an electric vehicle charging point ~~for each vehicle parking space provided~~. Note An electric vehicle charging point excludes the charging cable that connects between a residential unit's electrical outlet and the electric vehicle. The owner or driver of the electric vehicle is expected to provide this.
25.14.4.3 Integrated Transport Assessment Requirements 25.14.4.3a Travel Plan Requirements	WEL **supports in part** Rule 25.14.4.3a Travel Plan Requirements. However, WEL requests that Council includes a note to Rule 25.14.4.3a to exempt network utility activities. Construction or operation of network utility activities may trigger the requirement for a travel plan as the proposal may require the construction of a building on previously vacant	That Council **amends** Rule 25.14.4.3a Travel Plan Requirements by including a note under point (v), as follows: <u>*Note: 25.14.4.3a does not apply to Network Utilities.*</u>

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	land and/or the introduction of a new use. To ensure clarity WEL requests that the note be included to exempt network utility activities. It is noted that network utility sites are generally unmanned and do not generate large volumes of traffic.	
4.1 Residential Zones		
4.1.2 Objectives and Policies: All Residential Zones Policy 4.1.2.4d Non-residential activities must only serve the local residential area and be of a size that reflects the anticipated residential amenity of the neighbourhood.	WEL **supports in part** Policy 4.1.2.4d which requires non-residential activities to serve the local community. WEL submits that the policy be amended to exclude regional significant infrastructure which are non-residential and, in some circumstances, required to locate in residential areas but serve the region rather than the local community.	That Council **amends** Policy 4.1.2.4d, as follows: Policy 4.1.2.4d Non-residential activities must only serve the local residential area*, excluding regionally significant infrastructure*, and be of a size that reflects the anticipated residential amenity of the neighbourhood
4.1.2 Objectives and Policies: All Residential Zones Objective 4.1.2.5 Residential development incorporates sustainable features and technologies. Policy 4.1.2.5a Development must encourage the efficient use of energy and water, by: i. Incorporating water-sensitive techniques. ii. Off-setting the effects of loss of permeable surface iii. Reducing the use of reticulated electricity.	WEL **supports** Objective 4.1.2.5 and Policy 4.1.2.5b and **supports in part** Policy 4.1.2.5a which requires development to encourage the efficient use of energy and water through reducing the use of reticulated electricity while utilising solar energy and charging infrastructure. The policies fail to address that the demand for reticulated electricity infrastructure is only going to increase with intensification and more reliance on electric vehicles and small and community scale renewable energy. Further it is noted that increased electricity usage offsets more pollution intensive activities at a local level, such as	That Council **retains** Objective 4.1.2.5 and Policy 4.1.2.5b and **amends** Policy 4.1.2.5a, as follows: Policy 4.1.2.5a Development must encourage the efficient use of energy and water, by: i. Incorporating water-sensitive techniques. ii. Off-setting the effects of loss of permeable surface ~~iii. Reducing the use of reticulated electricity.~~ iv. Utilizing solar energy. v. Providing for electric mobility and its associated charging infrastructure.

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iv. Utilizing solar energy. v. Providing for electric mobility and its associated charging infrastructure. Policy 4.1.2.5b Ensure development implements methods and technologies to minimise the effects on climate change.	fireplaces. The explanation to the objective and associated polices states that *Residential units, for example, may wish to install solar panels on the roof and install a rainwater tank and provide infrastructure requirements for electric vehicles.* Part of the infrastructure requirements for electric vehicles includes the chargers as well as the electricity reticulation supplying the chargers.	
4.1.2 Objectives and Policies: All Residential Zones **Policy 4.1.2.6c** Building and development design achieves quality on-site amenity by providing: … viii. Energy-efficient and sustainable design technologies where compatible with the scale and form of residential development.	WEL **supports** Policy 4.1.2.6cviii and requests that a **new** Policy 4.1.2.6d is included to ensure buildings and development are located in positions that comply with the NZECP 34:2001. Through the intensification of Hamilton and the reduction of setbacks from the transport corridor, there is potential for development to be located in positions which may breach NZECP 34:2001. The proposed policy ensures that complying development is provided.	That Council **retains** Policy 4.1.2.6cviii and **include** Policy 4.1.2.6d, as follows: <u>*Policy 4.1.2.6d*</u> <u>*Ensure buildings and structures adjacent to electricity infrastructure in the Transport Corridor can comply with NZ Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001).*</u>
4.2 General Residential Zone		
4.2.5 Rules – General Standards – General Residential Zone. 4.2.5.6 Building Setbacks a. Transport corridor boundary – 1.5m	WEL **opposes** Rule 4.2.5.6a which provides for a setback from the Transport corridor of 1.5m. WEL requests that the rule is amended to ensure buildings and development are located in positions to comply with the NZECP 34:2001. Through the intensification of Hamilton and the reduction of setbacks from the transport corridor, there is potential for	That Council **amends** Rule 4.2.5.6a, as follows: 4.2.5.6 Building Setbacks a. Transport corridor boundary – 1.5m, <u>*provided the building or structure can achieve compliance with NZ Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001).*</u>

Specific provision	WEL's Submission	Revision sought (if any)
	development to be located in positions which may breach NZECP 34:2001. The proposed rule will give effect to proposed Policy 4.1.2.6d and ensures that complying development is provided.	
3 Medium Density Residential Zone		
4.3.4 Rules – General Standards – Medium Density Residential Zone 4.3.4.6 Building Setbacks a. Transport corridor boundary – 1 to 1.5m	WEL **opposes** Rule 4.3.5.6a which provides for a setback from the Transport Corridor of 1m to 1.5m. WEL requests that the rule is amended to ensure buildings and development are located in positions to comply with the NZECP 34:2001. Through the intensification of Hamilton and the reduction of setbacks from the transport corridor, there is potential for development to be located in positions which may breach NZECP 34:2001. The proposed rule will give effect to proposed Policy 4.1.2.6d and ensures that complying development is provided.	That Council **amends** Rule 4.3.5.6a, as follows: a. Transport corridor boundary – 1 to 1.5m, <u>*provided the building or structure can achieve compliance with NZ Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001).*</u>
4.4 High Density Residential Zone		
4.4.5 Rules – General Standards – High Density Residential Zone 4.4.5.6 Building Setbacks a. Transport corridor boundary – 1m	WEL **opposes** Rule 4.4.5.6a which provides for a setback from the Transport Corridor of 1m. WEL requests that the rule is amended to ensure buildings and development are located in positions to comply with the NZECP 34:2001. Through the intensification of Hamilton and the reduction of setbacks from the transport corridor, there is potential for development to be located in positions which may breach	That Council **amends** Rule 4.4.5.6a, as follows: a. Transport corridor boundary – 1m, <u>*provided the building or structure can achieve compliance with NZ Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001).*</u>

Specific provision	WEL's Submission	Revision sought (if any)
	NZECP 34:2001. The proposed rule will give effect to proposed Policy 4.1.2.6d and ensures that complying development is provided.	
1.1 Definitions and Terms		
Community scale energy generation (produces less than 20kW): Means renewable energy generation for the purpose of using electricity on a particular site, supplying an immediate community, or connecting into the distribution network (but excludes solar panels supplying electricity for the site on which they are located).	WEL **requests** that the definition of community scale energy generation is amended to be more enabling of renewable energy generation. The definition currently places a 20kW restriction on all community-scale renewable energy generation and it is unclear what the effects of 20kW generation versus 21kW or more. WEL considers that the 20kW limit is arbitrary and doesn't translate to actual effects. It is noted that the scale of generation is limited in scale by the means of only being able to supply the community or connect to the distribution network (i.e., instead of Transpower's National Grid). Renewable energy will become increasingly important to New Zealand's future and in particular to the intensification of Hamilton. The rules for renewable energy should be more enabling.	That Council **amends** the definition of community scale energy generation, as follows: Community scale energy generation: ~~(produces less than 20kW):~~ Means renewable energy generation for the purpose of using electricity on a particular site, supplying an immediate community, or connecting into the distribution network (but excludes solar panels supplying electricity for the site on which they are located).
Electric vehicle charging point: Means either a Mode 2 or Mode 3 electric vehicle charger as defined in NZS PAS 6011:2021. Note	WEL **supports in part** the definition of electric charging point which provides specific details on charging point requirements. WEL request that the definition is amended to reference	That Council **amends** the definition of electric vehicle charging point, as follows: Electric vehicle charging point: Means either a Mode 2 <u>*as defined in AS/NZS 3000:2018*</u>

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An electric vehicle charging point excludes the charging cable that connects between a residential unit's electrical outlet and the electric vehicle. The owner or driver of the electric vehicle is expected to provide this.	AS/NZS 3000:2018 7.9.3 to a Mode 2 charging point. A Mode 2 charger would only require a standard power socket to be installed to comply with NZS PAS 6011:2021, whereas a Mode 2 charger to comply to AS/NZS 3000:2018 7.9.3 would require a minimal current-carrying capacity of 20A and unable to supply any other socket- outlet point or point in wiring.	*7.9.3* or Mode 3 electric vehicle charger as defined in NZS PAS 6011:2021. Note An electric vehicle charging point excludes the charging cable that connects between a residential unit's electrical outlet and the electric vehicle. The owner or driver of the electric vehicle is expected to provide this.
Redevelopment of impermeable surfaces: The replacement or reconstruction of impermeable surfaces, excluding: a. Maintenance or repairs, such as: i. Pothole repairs to parking areas, driveways and paving; and ii. Painting of roofing and exterior cladding; b. Resurfacing that does not involve re-direction of existing stormwater flows or drainage networks; and c. Trenching and resurfacing associated with the installation, maintenance, repair and replacement of underground equipment, underground infrastructure, or underground utility works.	WEL **supports** the definition of "redevelopment of impermeable surfaces" as it excludes trenching and resurfacing associated with the installation, maintenance, repair and replacement of underground equipment, underground infrastructure, or underground utility works.	That's Council **retains** the definition of redevelopment of impermeable surfaces.
Small-scale energy generation (produces less than 20kW): Means renewable energy generation for the purpose of using electricity on a particular site or connecting into the distribution network (but excludes solar panels supplying electricity for the site on which they	WEL **requests** that the definition of small-scale energy generation is amended to be more enabling of renewable energy generation. The definition currently places a 20kW restriction on all renewable and it is unclear what the effects of 20kW	That Council **amends** the definition of community scale energy generation, as follows: Small-scale energy generation ~~(produces less than 20kW)~~: Means renewable energy generation for the purpose of

Specific provision	WEL's Submission	Revision sought (if any)
are located).	generation versus 21kW or more. WEL considers that the 20kW limit is arbitrary and doesn't translate to actual effects. Small scale energy generation is already restricted by the requirement to only serve the site. Renewable energy will become increasingly important to New Zealand's future and in particular to the intensification of Hamilton. The rules for renewable energy should be more enabling.	using electricity on a particular site or connecting into the distribution network (but excludes solar panels supplying electricity for the site on which they are located).
Transport infrastructure: Means any structure that is necessary for the functioning of the transport network and that caters for the needs of transport users. This includes but is not limited to surfacing and pavement, traffic services and structures such as transport lighting, bridges, retaining walls, bus shelters, taxi shelters, information fixtures for bus passengers, parking and loading spaces and facilities, end-of-journey facilities, litter bins, drinking fountains, charging points for mobility scooters, electric vehicles, micro-mobility devices, and public seating.	WEL **supports in part** the definition of Transport Infrastructure. The definition includes the provision of electric vehicles, but it is not clear that it includes electric vehicle chargers. WEL submits that the definition is amended to make it clear that it includes electric vehicle chargers which can be located in some instances adjacent to parking and loading spaces for cars and buses.	That Council **amends** the definition of Transport Infrastructure as follows: Transport infrastructure: Means any structure that is necessary for the functioning of the transport network and that caters for the needs of transport users. This includes but is not limited to surfacing and pavement, traffic services and structures such as transport lighting, bridges, retaining walls, bus shelters, taxi shelters, information fixtures for bus passengers, parking and loading spaces and facilities, end-of-journey facilities, litter bins, drinking fountains, charging points for mobility scooters, electric vehicles *and* micro-mobility devices, and public seating.
1.3 Assessment Criteria		

Specific provision	WEL's Submission	Revision sought (if any)
1.3.2 Controlled Activities – Matters of Control. G. Subdivision Subdivision within the General Residential, Medium density and High Density Residential Zones. i. The extend to which the subdivision does not increase the noncompliance with the Standards within the Residential Chapter. ii. The subdivision contains an existing residential unit or a land use consent has been granted or is accompanied by a land use consent. iii. No vacant allotments are created.	WEL **supports in part** the matters of control contained in section 1.3.2g which provide for subdivision in the residential areas. However, WEL request that a new matter of control is included to ensure that building platforms can be located in positions where a subsequent building can comply with the NZECP 34:2001. Further WEL request that the policy be amended to ensure that vegetation to be planted in the vicinity of electricity infrastructure should be selected and/or managed so that it does not breach the Tree Regs. Through the intensification of Hamilton and the reduction of setbacks from the Transport Corridor, there is potential for future development to be located in positions which may breach NZECP 34:2001. The proposed policy ensure that a compliant building platform can be provided.	That Council **amends** 1.3.2g Controlled Activities – Matters of Control, as follows: G. Subdivision Subdivision within the General Residential, Medium density and High Density Residential Zones. i. The exten~~d~~*t* to which the subdivision does not increase the noncompliance with the Standards within the Residential Chapter. ii. The subdivision contains an existing residential unit or a land use consent has been granted or is accompanied by a land use consent. iii. No vacant allotments are created. *iv. The proximity of allotments to any existing network utilities and any requirements that may be considered necessary to ensure the continued safe, efficient and effective operation of those network utilities is not compromised.*
1.3.3 Restricted Discretionary, Discretionary and Non-Complying Assessment Criteria Transportation General G1 The extent to which the proposal: … h. Gives effect to Te Ture Whaimana by: i. Realising opportunities to maintain and enhance public access to and along the Waikato River in accordance with Policy 2.2.2b	WEL **supports in part** 1.3.3.G1.h which gives effect to Te Ture Whaimana by enhancing public access to the Waikato River and planting along transport corridors. WEL request that 1.3.3.G1.h be amended to refer to Policy 25.14.2.1q (subject to amendment) ensure appropriate plant selection in Transport Corridors, in the vicinity of electricity infrastructure, be selected and/or managed so that the Tree Regs are not breached. The proposed amendment would be consistent with	That Council **amends** 1.3.3.G1.h. as follows: Transportation General G1 The extent to which the proposal: … h. Gives effect to Te Ture Whaimana by: i. Realising opportunities to maintain and enhance public access to and along the Waikato River in accordance with Policy 2.2.2b ii. Including the planting, retention, and maintenance of

Specific provision	WEL's Submission	Revision sought (if any)
ii. Including the planting, retention, and maintenance of indigenous trees and vegetation within transport corridors and supporting the establishment of ecological corridors.	Objective 18.2.4 and Policy 18.2.4a which seeks to enable non-network utility activities provided they do not compromise the function, safety and efficiency of the transport corridor, and the provision and operation of network utility infrastructure.	indigenous trees and vegetation within transport corridors*, in accordance with* *Policy 25.14.2.1q* and supporting the establishment of ecological corridors.
Transportation Access G9 The extent to which the proposal minimises the number of vehicle access points to transport corridors, considering: **…** f. Potential obstruction for access to network utilities.	WEL **supports in part** 1.3.3.G9.f which seeks to ensure that vehicle crossing points do not obstruct access to network utilities. The requirement as worded is supported and will ensure that WEL are able to access network utility equipment for maintenance and repair. However, the matter of discretion fails to address how intensification may affecting existing electricity infrastructure in some circumstances entranceways/driveways being created in unsafe locations in the vicinity of existing infrastructure. Further, Objective 25.7.2.1 provides for the importance of network utilities to support the development and functioning of Hamilton is recognised. Policy 25.7.2.1b seeks to ensure that existing network utilities shall not be adversely affected by subdivision, land use and development.	That Council **amends** 1.3.3.G9.f. as follows: Transportation Access G9 The extent to which the proposal minimises the number of vehicle access points to transport corridors, considering: **…** f. Potential obstruction for access to network utilities *and potential for network utilities to be in unsafe locations.*
I Network Utilities and Transmission Network Utilities New heading "Electricity Distribution"	WEL **supports in part** section I of the assessment criteria which seeks to ensure that network utilities to not generate adverse effects. However, this section fail address how development may adversely affect network utilities,	That Council **includes** new assessment criteria I12, as follows: *Electricity Distribution*

Specific provision	WEL's Submission	Revision sought (if any)
	specifically electricity distribution infrastructure. Through the intensification of Hamilton and the reduction of setbacks from the transport corridor, there is potential for future development to be located in positions which may breach NZECP 34:2001. The assessment criteria sought will ensure that development does not adversely affect existing electricity distribution infrastructure. Further, the amendment will ensure appropriate plant selection in transport corridors in the vicinity of electricity infrastructure should be selected and/or managed so that it does not breach the Tree Regs. The proposed amendments would be consistent with Objective 18.2.4 and Policy 18.2.4a which seeks to enable non-network utility activities provided they do not compromise the function, safety and efficiency of the transport corridor, and the provision and operation of network utility infrastructure. It is noted that I7 does not relate to electricity distribution infrastructure.	<u>*I12 The extent to which the location, height, scale, orientation and use of buildings and structures is appropriate to manage the following effects.*</u> *a.* <u>*The risk to the structural integrity of the electricity distribution line.*</u> *b.* <u>*The effects on the ability of the electricity distribution line owner to access, operate, maintain and upgrade the electricity distribution network.*</u> *c.* <u>*The risk of electrical hazards affecting public or individual safety, and risk of property damage.*</u> *d.* <u>*The extent of earthworks required, and use of mobile machinery near distribution lines, which may put the line at risk.*</u> *e.* <u>*Minimising adverse effects including reverse sensitivity, visual and nuisance effects on and from distribution lines.*</u> <u>*Note: The New Zealand Electrical Code of Practice NZECP 34:2001 contain restrictions on the location of structures in relation to lines.*</u> <u>*I13. The extent of separation between specified building envelopes and existing lines ensures any adverse effects on and from the electricity distribution network and on public safety are appropriately avoided, remedied or mitigated.*</u> <u>*I14. The extent of separation between the location of any proposed trees and existing electricity distribution*</u>

Specific provision	WEL's Submission	Revision sought (if any)
		lines, taking into account: a. *The likely mature height of the trees,* b. *Whether they have potential to interfere with the lines, and* c. *Whether an alternative location for the trees would be more suitable to meet the operational requirements of the lines' owner.* *Note: All trees/vegetation planted near electricity distribution lines must achieve compliance with the Electricity (Hazards from Trees) Regulations 2003.* *I15 The extent to which appropriate safeguards are in place to avoid contact or flashovers from lines, and effects on the stability of support structures.* *Note: All earthworks, including the use of mobile plant, must comply with the requirements of the New Zealand Electrical Code of Practice 34:2001 (NZECP 34:2001).*
Appendix 15 Transportation		
Table 15-5a)i: Criteria for the form of Internal Vehicle Access **Residential Land Use Environment** Berm Requirements Service corridor (min desirable)	WEL **support in part** Table 15-5a)i: Criteria for the form of Transport Corridor for Berm Requirements. However, WEL request that the word "desirable" be replace with "required". The reasoning for this request is to ensure that more scrutiny is placed on achieving a higher level of compliance. WEL submits that the berm widths provided for in Table 15-5a)i	That Council **amends** Table 15-5a)i: Criteria for the form of Transport Corridor, as follows: Berm Requirements Service corridor (min ~~desirable~~ *required*)

Specific provision	WEL's Submission	Revision sought (if any)
	are sufficient to enable underground utilities as well as footpaths, amenity planting and road furniture. A width any less will likely create long term issues such as utility congestion, potential root damage to utilities and disruption of planting and furniture during maintenance and upgrading of utilities. Further, it is noted that the restricted discretionary activity status currently provides for a level of flexibility regardless of the wording, however the word 'required' rather than 'desirable' may encourage a higher level of achieving compliance with the berm widths to avoid long term problems.	
Table 15-5a)ii: Criteria for the form of Transport Corridor Berm Requirements Service corridor (min desirable)	WEL **support in part** Table 15-5a)ii: Criteria for the form of Transport Corridor for Berm Requirements. However, WEL request that the word "desirable" be replace with "required". The reasoning for this request is to ensure that more scrutiny is placed on achieving a higher level of compliance. WEL submits that the berm widths provided for in Table 15-5a)ii are sufficient to enable underground utilities as well as footpaths, amenity planting and road furniture. A width any less will likely create long term issues such as utility congestion, potential root damage to utilities and disruption of planting and furniture during maintenance and upgrading of utilities. Further, it is noted that the restricted discretionary activity status currently provides for a level of flexibility regardless of the wording, however the word 'required' rather than	That Council **amends** Table 15-5a)ii: Criteria for the form of Transport Corridor, as follows: Berm Requirements Service corridor (min ~~desirable~~ <u>*required*</u>)

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	'desirable' may encourage a higher level of achieving compliance with the berm widths to avoid long term problems.	
Chapter 25.7 Network Utilities		
25.7.3 Rules – Activity Status xx. Community scale distributed renewable energy generation - Discretionary	WEL requests that Rule 25.7.3xx is **amended** which provides for community scale distributed renewable energy. WEL submits that the activity status should be restricted discretionary activity rather than discretionary. WEL submits that renewable energy will become increasingly important to New Zealand's future and in particular to the intensification of Hamilton. The rules for renewable energy should be more enabling.	That Council **amends** Rule 25.7.3xx, as follows: xx. Community scale distributed renewable energy generation – <u>*Restricted*</u> Discretionary
25.7.3 Rules – Activity Status yy. Solar panels and solar heating systems for the purposes of serving the site on which they are located - Permitted zz. Solar panels and solar heating systems for the purposes of serving more than one site - Restricted Discretionary	WEL requests that a new rule is included to enable roof top solar panels and solar heating systems for the purposes of serving more than one site as a permitted activity**.** Currently if large scale solar was installed on the roof top of a commercial or industrial building for the purposes of serving the site and other sites, resource consent would likely be required. Solar power will become increasingly important to New Zealand's future and in particular to the intensification of Hamilton, through (for example) installing commercial scale solar on roof tops of industrial and commercial buildings to supply communities. It is renewable, one of the cheapest	That Council includes **a new rule** to enable roof top solar panels and solar heating systems for the purposes of serving more than one site, as follows: yy. Solar panels and solar heating systems for the purposes of serving the site on which they are located - Permitted zz. Solar panels and solar heating systems for the purposes of serving more than one site - Restricted Discretionary <u>*zzz.*</u> <u>*Roof top solar panels and solar heating systems for the purposes of serving more than one site - Permitted*</u>

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	forms of renewable energy, and has advantages over wind in terms of construction times and the potential for adverse effects. It is critical that the District Plan makes provision for community scale solar farms in appropriate sites.	
25.7.5.5 Cabinets, Equipment and Other Structures a) Maximum volume for individual cabinets or other above ground structures for electricity and telecommunications: i. Industrial, Ruakura Industrial Park, Te Rapa North Industrial, Business 1 to 7, Central City and Ruakura Logistics zones ii. Transport Corridor Zone and all other zones	WEL requests that Rule 25.7.5.5a is **amended** which provides for cabinets and other structures in the Industrial, Ruakura Industrial Park, Te Rapa North Industrial, Business 1 to 7, Central City and Ruakura Logistics zones ii. Transport Corridor Zone and all other zones. WEL submit that there is uncertainty regarding whether overhead transformers or batteries are included in the rule and request their specific inclusion to remove any ambiguity. Batteries, and other forms of network utility infrastructure will become increasingly important as the country moves towards a higher capacity of renewable energy, the demand for electricity increases through intensification. For these reasons it is important that there is a clear understanding of which forms of infrastructure are permitted.	That Council **amends** Rule 25.7.5.5a, as follows: a) Maximum volume for individual cabinets*, batteries* or other above ground *or overhead structures* for electricity and telecommunications: i. Industrial, Ruakura Industrial Park, Te Rapa North Industrial, Business 1 to 7, Central City and Ruakura Logistics zones ii. Transport Corridor Zone and all other zones
25.8 Noise and Vibration		
25.8.3.6a Events and Temporary Activities a) The relevant zone noise standards shall apply to all events and temporary activities, except as provided in	WEL requests that Rule 25.8.3.6a for Events and Temporary Activities is **amended** to include the provision of Temporary generators, as a permitted activity.	That Council **amends** Rule 25.8.3.6a, as follows: a) The relevant zone noise standards shall apply to all events and temporary activities, except as provided in

Specific provision	WEL's Submission	Revision sought (if any)
Rule 25.3.5.2(c) and 25.3.5.3(e).	WEL submit that temporary generators are currently not exempt from noise rules, and this can become problematic when a generator is required for emergency and maintenance situation where temporary generation is required. Intensification will trigger the need to upgrade existing infrastructure and, in some instances, generators will be required to keep existing electricity supply operational.	Rule 25.3.5.2(c), ~~and~~ 25.3.5.3(e) *<u>and 25.7.6.3.</u>*