

FDS ID	First Name	Last name	Organisation Name	Page Number
Late Submissions to be accepted				
MAN026	Graeme	McCarrison	Spark	2
MAN027	Leah	Murphy		5
MAN028	Angela	McCleod		8
MAN029	Corrina	Tessendorf	M & J Walsh Partnership Ltd	11
MAN030	Stu	Horswell	Electra	14
MAN031	Chloe	Sparks	Wellington Electricity	18
MAN032	Jason	Durry	Silverstream Railway Inc	25

Parvati Rotherham

From: Parvati Rotherham
Sent: Friday, 10 November 2023 9:05 am
To: futuredevelopmentstrategy
Subject: FW: Future Development Strategy now open for Consultation - Spark and Telco's

From: Graeme McCarrison <[REDACTED]>
Sent: Friday, November 10, 2023 8:31 AM
To: Parvati Rotherham <Parvati.Rotherham@gw.govt.nz>
Subject: RE: Future Development Strategy now open for Consultation - Spark and Telco's

Mōrena Parvati

I just realised I missed the date for putting in a supporting submission on behalf of Spark, Chorus, One NZ, FortySouth and Connexa for the draft Future Development Strategy. My mistake for mixing up the dates and basically just too many competing dates for submissions and evidence. Just wanted to say the following (which would have been our submission points) :

1. Massive thankyou for the opportunities to workshop and provide early feedback and information.
2. The Greater Wellington Future Development Strategy reflects the importance of telecommunications for the greater Wellington region.
3. Nice to see telecommunications part of the definition of significant infrastructure.
4. The Telecommunications sub-section is really useful.
5. Recognition of place of telecommunications to support the priority areas.
6. Recognition that reviews of District Plans are required as part of the implementation of the Future Development Strategy in collaboration with telecommunications providers. Greater Wellington is first FDS to make this statement and recognition the value of collaboration. I personally have been working in this industry for now nearly 12 years this is a first. I and the first value collaboration during the early development of plans as essential to good Plan making and saves so much time.
7. The only missing point is about recognition of interdependencies especially power supply and telecommunications. Greater Christchurch added, after our engagement/workshop/submission, into their FDS the following: *Recognising interdependencies in the infrastructure sector, especially between telecommunications and electricity, and acknowledging the role they play in responding to, and recovering from, natural hazard events*. The importance of this direction in the FDS is that as we develop and redevelopment areas and put in new and upgraded infrastructure it is important to think how we build resilience.

I look to continuing to work with you and the Greater Wellington FDS team. I hope the submissions have been positive and constructive.

Ngā mihi
Graeme



Graeme McCarrison
Planning & Engagement Manager
Technology
Spark New Zealand Trading Limited

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From: Parvati Rotherham <Parvati.Rotherham@gw.govt.nz>
Sent: Friday, October 13, 2023 1:00 PM
To: futuredevelopmentstrategy <future.developmentstrategy@wrlc.org.nz>
Cc: Kim Kelly <Kim.Kelly@gw.govt.nz>; Freda Wells <Freda.Wells@gw.govt.nz>
Subject: Future Development Strategy now open for Consultation

Kia ora all,

This week we started consultation on the Future Development Strategy and we're reaching out to the development and infrastructure community we talked to earlier in the year to make you're aware of this. Everything you need to know is online here: <https://wrlc.org.nz/future-development-strategy>.

We'd welcome a submission from you or your organisation about the strategy and if you'd like to know more or ask questions next week we are holding 2 public webinars that you're welcome to join. Information about signing up for these is here:

- Tuesday 17th October - <https://wrlc.org.nz/future-development-strategy-overview-webinar> (more relevant if you're a newbie)
- Thursday 19th October - <https://wrlc.org.nz/future-development-strategy-dive-into-details-webinar> (more relevant if you know what an FDS is and concepts about planning)

Alongside the strategy we will prepare an implementation plan which is currently being pulled together, feel free to add feedback in the survey about your ideas for implementing this strategy. We will be testing the implementation plan with the development and infrastructure providers community early in 2024, keep an eye out for an invite to this later in the year.

If you have any more specific questions, please email future.developmentstrategy@wrlc.org.nz

Thank you,

Parvati

Parvati Rotherham (she/her) | Project Lead – Future Development Strategy
Wellington Regional Leadership Committee
Waea 021 932 057 | www.wrlc.org.nz



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Parvati Rotherham

From: Leah Murphy [REDACTED]
Sent: Friday, 10 November 2023 11:03 am
To: futuredevelopmentstrategy
Subject: Re: Submission on FDS

Thank you. Sorry it was so very basic! I didn't really set aside the time I needed to make it a good one. But just wanted to put in a vote for some important themes!

Leah

Leah Murphy (she/her)
Island Bay, Wellington
[REDACTED]

On Fri, Nov 10, 2023 at 7:55 AM futuredevelopmentstrategy <future.developmentstrategy@wrlc.org.nz> wrote:

Kia ora Leah,

Thanks for your submission this email confirms receipt and we'll review the submission in more detail over the coming week we'll be collating all submissions into a publicly available report by the end of this month and will keep you posted.

Thanks

Parvati

From: Leah Murphy [REDACTED]
Sent: Thursday, November 9, 2023 11:56 PM
To: futuredevelopmentstrategy <future.developmentstrategy@wrlc.org.nz>
Subject: Submission on FDS

Hello

I'd like to put in a submission on the FDS.

I am submitting as myself

Overall note: as there is no option for “support and want it to go harder” or “do not support because it’s not strong enough”, I have been forced to tick “support” throughout.

Q1: vision and strategic direction

I support the vision and strategic direction but especially the Mana Whenua statement of values and aspirations because it’s a very basic start. The direction should have prioritised or weighted objectives, particularly equity and emissions reduction, so it was able to start a paradigm shift in how we manage urban development.

Q2: Our plan for where we develop housing...

I do not support the proposal because it is not strong enough. I wish to see the FDS apply a string threshold for considering any free fiends development with a focus on minimising new infrastructure and enabling communities to reduce emissions. Also there should be a focus on green/good intensification near trans sport nodes ahead of greenfields.

Q3: no comment

Q4: key infrastructure...

I do not support the proposal because it is not strong enough. I wish to see the FDS apply a prioritisation for infrastructure needed intensification.

All this assessment should be done by a highly qualified and independent third party, such as a region-wide experts’ group accountable to the infrastructure Commission or some other non-council body.

Q5: limit or avoid development...

I do not support this proposal as it seems unlikely that public subsidy will be withdrawn for slated greenfield areas. If it were to be, I would support this proposal.

Q6: iwi and hapu values and aspirations

I support these and the FDS would do well to take on their ambition.

Q7: what else is important:

Providing for waking and cycling as much as possible!

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Parvati Rotherham

From: Angela McLeod [REDACTED]
Sent: Friday, 10 November 2023 3:38 pm
To: futuredevelopmentstrategy
Subject: Re: Feedback thwarted

Ok, I was filling out the survey.

Re Housing: Support. Comment: some emphasis on equity of access to food should be included in housing developments when planning them.

Re Business areas: Support. Comment: some support for food production, distribution and retail as viable businesses, with things such as preference for local food businesses in the mix of available premises/properties.

Support the submission of RKN Advocacy Group and their final comments.

Would like to speak to my submission.

Ngā mihi

Angela

Angela McLeod
Community Leader
[REDACTED]

Possibly sent outside of your normal working hours (please only reply within yours) and from a small device - apologies in advance for any typos (even though the tiny keyboard is QWERTY)

[Outlook for Android](#)

From: futuredevelopmentstrategy <future.developmentstrategy@wrlc.org.nz>
Sent: Friday, November 10, 2023 1:12:12 PM
To: Angela McLeod [REDACTED]
Subject: RE: Feedback thwarted

Ahh I see this one must not have worked sorry – please feel free to email back your feedback today and we'll count it.

Thanks

Parvati

From: Angela McLeod [REDACTED]
Sent: Friday, November 10, 2023 1:11 PM
To: futuredevelopmentstrategy <future.developmentstrategy@wrlc.org.nz>
Subject: Re: Feedback thwarted

Thank you,

I have a submission for the Regional Kai Network and from me personally. It's the second one that I couldn't complete.

Ngā mihi

Angela

Angela McLeod
Community Leader
[REDACTED]

Possibly sent outside of your normal working hours (please only reply within yours) and from a small device - apologies in advance for any typos (even though the tiny keyboard is QWERTY)

[Outlook for Android](#)

From: futuredevelopmentstrategy <future.developmentstrategy@wrlc.org.nz>
Sent: Friday, November 10, 2023 12:56:11 PM
To: Angela McLeod [REDACTED]
Subject: RE: Feedback thwarted

Kia ora Angela,

Thanks for your submission. It looks like it must have worked I can see an entry from you. I can send you your response on Monday once its been individually extracted so you can check its all there.

Have a great weekend.

Parvati

From: Angela McLeod [REDACTED]
Sent: Thursday, November 9, 2023 5:17 PM
To: futuredevelopmentstrategy <future.developmentstrategy@wrlc.org.nz>
Subject: Feedback thwarted

Dear team,

I had nearly finished my personal submission when it stopped working. Granted it was a little after 5, however, it would be nice to have the chance to see if what I had completed was submitted.

Many thanks in advance.

Ngā mihi mahana

Angela

Angela McLeod
Community Advocate, Champion, Supporter | Upper Hutt
C: [REDACTED] | [Website](#)

Follow me on [Facebook](#) | [Instagram](#) | [Twitter](#) | [LinkedIn](#)

I support flexible working. It suits me to send this email out of typical office hours - however in supporting flexible working I do not expect you to reply outside your regular work hours.

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**SUBMISSION / FEEDBACK ON THE FUTURE DEVELOPMENT STRATEGY
WELLINGTON REGIONAL LEADERSHIP COMMITTEE**

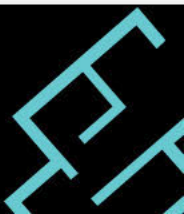
To: Wellington Regional Leadership Committee.
By email to: future.developmentstrategy@wrlc.org.nz

Submission on: Wairarapa-Wellington-Horowhenua Future Development Strategy

Name of Submitter: Urban Edge Planning Ltd
on behalf of M & J Walsh Partnership Ltd

Address for service: Urban Edge Planning
PO Box 39071
Wellington Mail Centre
Lower Hutt 5045

Attention: Corinna Tessendorf
[REDACTED]
[REDACTED]



Issue

This submission relates to the site at 12 Shaftesbury Grove, Stokes Valley, Lower Hutt. The site is located at the end of Shaftesbury Grove, has an area of approximately 12.5ha and is legally described as Lot 1 DP 507600 CT 7771535.



Figure 1 – Aerial Image and District Plan Map of Plan Change Site (Source: HCC WebMaps)

Background

The site at 12 Shaftesbury Grove is currently zoned partially as Hill Residential Activity Area (approximately 7.6ha) and partially as General Recreation Activity Area (approximately 4.9ha) under the operative Hutt City District Plan.

The site is characterised by a relatively flat ridgeline with steeper hillsides on both sides. It is undeveloped except for a formed but unsealed access track following the ridgeline the entire length of the site and two cell phone towers. The track provides access to the Delaney Reservoir which is located to the south of the site.

Hutt City Council's Urban Growth Strategy identifies the site as part of an area where the feasibility of development should be further investigated. The site was previously owned by Hutt City Council and partially vested as reserve. In 2016 Hutt City Council initiated the reserve revocation process to provide for future residential development of the site. It was then declared surplus to Council's requirements and sold to M & J Walsh Partnership Ltd (the plan change requestor) in December 2017. The material provided with the marketing package included indicative development schemes for up to 180 houses and several technical report, including reports on water supply and other services.

After ongoing consultation with Hutt City Council the owner has recently lodged a private plan change request for the site. The private plan change seeks the rezoning of the site to Medium Density Residential Activity, which would be consistent with the zoning of surrounding residential areas. The private plan change also proposes the introduction of the site specific provisions to address the identified site specific issues and opportunities (where these are not sufficiently addressed by the current provisions in the Operative District Plan).

The private plan change was accepted by Hutt City Council at the Full Council meeting on 30 October 2023 and is expected to be publicly notified on 09 November 2023.

Submission / Feedback

We request that the site at 12 Shaftesbury Grove is recognised and included in the Future Development Strategy as a Future Development Area. This would appropriately reflect the current Hill Residential Zoning of the site and the proposed rezoning to Medium Density Residential with site specific provisions. It would also align with Hutt City's Urban Growth Strategy.

Shaftesbury Grove represents a greenfield development opportunity that is located right adjacent to existing residential development and in reasonably close proximity to the Stokes Valley commercial centre. The main constraint is the insufficient water supply capacity in the catchment to serve additional development in the area.

The site does not contain any class 1, 2 or 3 type soils and therefore is not classified as highly productive land.

While the property is partly affected by an identified SNR (SNR 50 – Stokes Valley Bush) the relevant District Plan rules ceased to apply to SNRs on private land in 2005. The most recent Ecology and Landscape project undertaken by Council from 2016 to 2018 did identify two potential Significant Natural Areas (SNA) on the site that were significantly smaller than the SNR 50 overlay, located over a gully on the western side of the site and along the southwestern boundary of the site. However, in 2018 Hutt City Council decided not to proceed with the plan change and as such no mandatory restrictions on private land or SNAs were introduced into the District Plan.

There are no significant cultural or archaeological sites or heritage buildings and structures identified on the site.

The site is not subject to any natural hazard risks identified by the Operative District Plan (Wellington Fault Overlay, Inundation, Overland Flowpaths, Stream Corridors, Coastal Hazards).

Based on the above we consider that the property at 12 Shaftesbury Grove forms part of the urban environment and should be included in the urban zone as shown on the FDS maps



Corinna Tessendorf
Urban Edge Planning Ltd

On behalf of
M & J Walsh Partnership

Date: 10 November 2023

WELLINGTONLevel 2, 29 Waterloo Street
Lower Hutt 5010

P.O. Box 30024, Lower Hutt 5040

P +64 4 576 9644 | align.net.nz

13 November 2023

Parvati Rotherham
Project Lead
Future Development Strategy
WRLC Secretariat

By e-mail: future.developmentstrategy@wrlc.org.nz

SUBMISSION ON BEHALF OF ELECTRA ON THE PROPOSED FUTURE DEVELOPMENT STRATEGY FOR THE WELLINGTON REGION

Thank you for the opportunity to submit on this document.

Electra, as the electricity distribution company for Horowhenua and Kapiti Coast Districts, understands the critical importance of installing the safest and most efficient electrical infrastructure. Electra undertakes continuous efforts to improve, extend and replace infrastructure, to ensure dependable electricity connections.

Electrical distribution utilities need to be aligned with the region's growth and future development, to this end Electra acknowledges the significance of considering future development pressures and trends. We agree with the need for regional guidance on sustainable growth and development, along with a strategic spatial plan to steer future development.

To ensure that the electrical distribution infrastructure is provided efficiently in harmony with these growth objectives, Electra would like to submit the following comments regarding the Draft Future Development Strategy (FDS).

The wider context of this submission is the national energy transition from fossil fuels to renewable sources (mainly electrical energy) which will require radical changes over time in the quantity of electricity to be distributed and used in the region (increased), the quantity of local renewable generation (likely to increase, both as grid-scale plants and as domestic / business scale generation)

and local transformer and storage facilities (likely to increase). These changes need to be accommodated with the FDS process and subsequent spatial and land use planning processes.

Submission Points:

1. Support for objectives

Electra supports the FDS objectives, in particular:

- Providing for... compact, well-designed towns and cities
- A flourishing zero-emissions region
- We have the infrastructure we need to thrive

2. Request the identification of space for utilities:

Electra endorses the densification of existing urban areas. It is also crucial that the FDS ensures that these denser zones allocate sufficient space for essential infrastructure such as larger substations, battery storage, and vehicle charging to be developed or implemented. This can be signalled in the FDS but would need to be implemented through district plans or other land use planning instruments as well as through district council development engineering policies and approvals.

3. Electra supports the FDS Preference for Limited Greenfield Development:

Electra strongly advocates for concentrating greenfield development (both residential and business) in a few identified locations rather than dispersing it. This approach would be significantly more efficient for service delivery.

4. Electra supports Future Densification and Development Along Corridors:

Electra supports regional development along designated corridors, it would also be desirable to allow for infrastructure corridors where possible, to facilitate efficient provision of electricity infrastructure and other linear infrastructure (particularly transport and telecoms).

5. Focus areas for Renewable Energy Facilities:

Ideally the planning for renewable energy generation and storage facilities could be concentrated in a limited number of suitable areas (identified based on constraints mapping and consultation) rather than dispersing them throughout the region. This more centralised approach should be able to enhance efficiency and reduce the overall service costs and potentially reduce environmental impacts.

6. Promotion of Coordinated Infrastructure Planning:

The FDS should emphasise the importance of providing sufficient electrical infrastructure to facilitate the future development. Electra will therefore encourage and support the future development process where infrastructure planning in the region is coordinated in relation to the development needs. Electra

also recognises the evolving needs of the region and the necessity for a combination of long-term strategic planning and shorter-term decision-making involving various stakeholders. The FDS process (or subsequent regional planning processes) should provide forums for these discussions to occur.

7. Planning for local EV charging and home solar uptake

The FDS should note the increased demand and time of use implications due to increased uptake of EV's and consider how regional planning can respond to that e.g. the promotion of more home working would enable people to charge cars in the daytime with solar generated energy, rather than at night during peak use periods.

Where homeowners are generating electricity, they should be encouraged to use this internally – charge an EV, heat their water or home, or store it in their house battery.

If possible, the FDS could consider how EV charging can be provided for on a regional basis e.g. public charging networks / locations and strengthening of the grid for private charging.

8. Improving Collaboration between Developers, Councils and Electricity Lines Companies

Electra would like councils to communicate with developers to limit the erosion / reduction of footpaths and roadside berm areas in new subdivisions as this is leaving utility providers with very little space to install infrastructure.

Electra would welcome a regional scale review of the issues some councils have introduced by installing Geotech drainage mesh around and under footpaths, which makes it difficult to design a trench profile and install the required infrastructure and leaves no space for future upgrades or additional infrastructure around or through these subdivisions.

Electra would like to see an improved awareness from Regional and District councils of the limitations and costs of underground infrastructure, and why in most cases it would still be a better solution to provide overhead lines. The requirement by some councils to underground all new connections has various issues:

- It is more susceptible to impacts from natural hazards (flooding, tsunami, earthquake)
 - When utilities are undergrounded, it increases the timeframes to find and fix problems.
 - The costs associated with underground in comparison to overhead lines, underground lines are 10 times greater to install and much harder and more expensive to upgrade.
- This cost is ultimately passed to residents.

KiwiRail should be encouraged to take their power supply directly from Transpower rather than connecting to the Electra distribution network.

Conclusion

Electra thanks the Wellington Regional Leadership Committee for their work in this regard and trust that the infrastructure requirements for electricity distribution will receive the required attention to ensure a sustainable future development model.

For further discussions on these points please contact in the first instance:

Stu Horswell

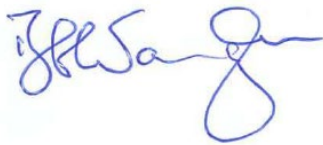
Network Planning Team Leader

Electra

[REDACTED]

Ph [REDACTED]

Yours sincerely,



Bernie Warmington

**Planning Manager – Wellington
Align Limited**



Submission to the Future Development Strategy

9 November 2023

Submission and contact details

Consultation	Future Development Strategy
Submitted to	Wellington Regional Leadership Committee
Submission address	future.developmentstrategy@wrlc.org.nz
Date submitted	9 November 2023
Submitter	Nick Merrington
Contact	Chloe Sparks
Email	[REDACTED]
Phone	[REDACTED]

Release of information

This report contains no confidential information and can be publicly disclosed.

1 Introduction

Wellington Electricity (WELL) would like to thank the Wellington Regional Leadership Committee (WRLC) for the opportunity to provide feedback on the draft Future Development Strategy (FDS) document. The strategy will drive the need for greater collaboration between stakeholders to build resilient infrastructures, support the government's net-zero emissions reduction plans, and create opportunities for the regions people.

WELL is a distribution network that manages the local lines that deliver power to Wellington, the Hutt Valley, and Porirua, powering around 173,000 homes and businesses. After many years of low electricity demand growth, WELL has been operating in a 'business as usual' setting and one of the most cost-effective distribution networks in the country. WELL is forecasting to increase the capacity of our network by greater than 100% to accommodate expected demand growth for electricity over the next 30 years. This is largely due to the uptake of transport electrification, the potential transition of 100MW of commercial gas use to electricity, and population growth.

As a regulated distribution network, WELL must justify the use of consumer funding by building for quality, affordability, and necessity. It is important that distribution networks make strategic decisions

for building the necessary network capacity requirements that will come about because of future developments. An uncoordinated or badly timed plan would result in higher costs for consumers and create resource constraints while there is a rush to electrify. The FDS will help set the pace for networks to build new capacity and how much distribution networks will need to invest.

2 Consultation Questions

2.1 Do you support our vision and strategic direction that guides the draft Future Development Strategy?

WELL supports the general theme and strategic direction through four areas that influence the investment decisions we will need to make in the future as an electricity distributor. The existing network infrastructure will need to increase capacity for more intensified housing; support conversions of carbon emitting activities to electrification; build a resilient network to protect against natural hazards; and support other infrastructure developments that need electricity supply.

Providing for affordable housing that meets our needs, and for compact well-designed towns and cities

WELL is impacted mostly by this objective to intensify housing within existing towns and cities. There are areas on our network that are forecast to exceed their capacity due to the changing framework of energy use. We are developing a strategy for where we may need to upgrade the network and what traditional investment will be impacted through the establishment of Distributed Energy Resources (DER) and flexibility services¹.

As towns become more compact with intensified housing, the future development strategy needs to ensure there is sufficient provision for EV charging, and the infrastructure built is well-timed to manage the uptake. EDBs do not have access to low voltage (LV) data where EV penetration is occurring due to privacy reasons, and this is a challenge for the electricity sector. With consumption data and IP connected devices (participating in flexibility trading/service) like residential EV chargers, we can utilise existing network capacity and maintain fluctuations in voltage and demand that would otherwise mean a larger traditional investment in infrastructure is required. This is closely linked to

¹ Flexibility services are consumers using DER such as solar/battery systems, and time-discretionary demand such as EV charging, to provide a service to the electricity market. This could for example include consumers receiving a payment from the EDB to discharge their battery during peak demand times to help defer the need to invest in upgrading the capacity of the distribution network.

the second strategic area ‘promoting a flourishing zero-carbon region’ where our submission will expand on this.

Promoting a flourishing zero-carbon region

A national energy strategy is being developed around decarbonising the electricity sector as part of MBIE’s ‘Advancing New Zealand’s Energy Transition’ and WELL believes that the electrification implementation of the FDS direction should be guided by the national strategy, rather than trying to intensify regional electricity generation that does not align with the national strategy. The Wellington region has a few areas of generation opportunities but will still require connection to the national grid as this is likely to remain the most cost-effective source of electricity for customers. There needs to be careful analysis of the benefits in increasing regional electricity generation against the costs that this would impose on consumers, compared to having access to the economies of scale provided by the high voltage transmission grid supplying electricity from large generation assets around the country.

The FDS covers the 30 years in which Boston Consulting Group’s ‘The Future is Electric’² predicts there is \$22bn of nationwide distribution investment required to meet electrification demands from the government’s net-zero targets by 2030, \$25bn in the 2030s, and \$24bn in the 2040s. It is essential that WELL can keep pace with electrification and that the regulatory regime allows this to happen. It is promising that the FDS acknowledges that renewable gases may have a potential to decarbonise areas of stationary energy emissions. As Wellington has the highest concentration of residential fossil gas connections in the country, any accelerated exit of gas use may cause price shocks to customers due to assets requiring upgrading sooner than currently forecast. The Gas Transition will underpin much of WELL’s ability to cater for electrification while maintaining a reliable and cost-effective supply to customers.

Over this time, modelling suggests that a household’s electricity bill will remain stable, and their total energy bill will decrease by 10-40% due to reductions in fossil fuel consumption.³ A large driver of household energy cost reductions and emission reductions will be through having access to an electric vehicle. It is important that intensified housing developments provide space and charging infrastructure for EVs so that people can have access to energy bill savings. Energy bill savings also are

² <https://www.bcg.com/publications/2022/climate-change-in-new-zealand>

³ <https://www.poweringup.org.nz/updates/total-household-energy-costs-will-reduce-with-electrification/>

predicted to come from more energy efficiencies and this is another opportunity for the WRLC to encourage energy efficient homes and businesses.

Protecting what we love

We support the FDS's strategic direction to build resilience by avoiding developments in areas that are prone to natural hazards, including areas affected by climate change, and prioritising developments around existing towns and cities.

WELL implores the WRLC to undertake early engagement with utilities such as WELL around decisions relating to climate change adaptation. This is due to the time lag in investment decisions required for electricity distribution, the large cost of those investments, and the risk of stranding assets should any decisions be implemented without adequate warning. For example, areas at significant risk from sea level rise may still require investment into assets to provide capacity and reliability for existing consumers, however those investment decisions can be optimised to minimise the total long-term cost to consumers if there is a clear understanding about the adaptation strategy and timeframes.

2.2 Do you support our proposal to prioritise housing development in our existing towns and cities and around our strategic transport network ie around current and future transport hubs and routes?

WELL agrees with the proposal to prioritise most housing developments in existing towns and cities ie. brownfields, as this will be less expensive than greenfield development. From a distribution network perspective, it is significantly more cost-effective to use existing infrastructure, with flexibility services maximising the utilisation of the capacity of those existing assets and targeted capacity upgrades where necessary, than to extend the network to provide significant capacity into new areas of development.

We support housing developments around our strategic transport network however, WELL would like to highlight the importance of coordination with the electricity sector to enable this implementation. For example, the electricity network has capacity at off-peak times and could provide electric bus charging without the need to drastically increase network capacity. This can also be matched with the demand profiles of other public transport, such as rail, to balance load. Additionally, it is important that charging hubs are not at the far ends of the network as this would require reinforcing of the whole line to carry the required capacity.

2.3 Do you support our proposal to prioritise business development in our existing towns and cities and around our strategic public transport network ie around current and future transport hubs and routes, to provide for sustainable, local employment?

WELL supports prioritising business development in existing cities for the same reasons as Q2. We also want to highlight one of the areas mentioned for development, Judgeford Flats, is currently rural and will require substantial upgrade of the electrical network in the area to provide the capacity and reliability required to support business growth. Other industrial areas such as Gracefield and Seaview have existing infrastructure that is already suitable for business development.

It is important to have clarity in the funding model for the new projects, especially those in greenfield areas, and to allow for better coordination between utilities during the execution of the projects. As noted in the draft strategy, the Let's Get Wellington Moving Transport Infrastructure Programme will give utilities the opportunity to replace or upgrade underground utilities. Coordination for this kind of work, with adequate lead time to allow for design, funding, and the procurement of materials, will be paramount to its success.

As outlined in our answer to question 2, WELL support the coordinated effort required to achieve this outcome.

2.4 Do you support our proposed approach to invest in infrastructure that is located in existing towns and cities and around current and future transport hubs and routes?

WELL agrees that there are constraints for developing infrastructure and that priorities need to be clearly managed for efficient use of resources. It is less expensive to maintain existing infrastructure than to extend infrastructure into new areas. However, the strategy proposes "speeding up the infrastructure required to enable us to meet our strategic direction" which is a risky approach and could result in poorly timed investments that are very costly, or infrastructure being unprepared.

From a distribution business perspective, WELL is regulated by the Commerce Commission and the Electricity Authority. There are legislative restrictions that can impose additional investment outside of the price path reset and, under the current statutory objectives, can be difficult to justify spending on additional capacity other than what is deemed necessary. This is because existing customers will fund most network investment/reinforcement through tariffs on their electricity bills. If there is additional funding by customer group one, they will be subsidising customer group two's capacity needs that leads to cost reallocation and an inequitable outcome.

As part of our submission for MBIE's Electricity Market Measures papers⁴, we have commented on the possibilities and challenges for the sector in the next few decades with a focus on flexibility services and breaking down barriers for investment into our network. WELL recommends that WRLC use the outcome of the National Energy Strategy to influence expectations on the speed to meet decarbonisation targets as this is a collaboration of energy industry expertise.

2.5 Do you support our proposed approach to protect the areas we love by avoiding or limiting urban development in areas that prone to natural hazards, land that is highly productive or land that contains high cultural or environmental/biodiversity values?

As a Lifeline Utility, WELL supports a need for resilient critical infrastructure and careful consideration for protecting areas prone to natural hazards. It is essential that the FDS considers the relationships between infrastructure, including electricity, transport corridors, telecommunications, and flood protection, rather than each being addressed in isolation. The result should be a coordinated approach to increasing resilience across each of these aspects, combined with measures to increase community and household resilience.

As noted in WELL's 2023 Asset Management Plan (AMP), EVs could increase household resilience, and this should be further motivation for WRLC to support residential EV charging infrastructure in the plan.

2.6 How do you think we can best support the values and aspirations of Māori in our region through the implementation of the Future Development Strategy?

No comment.

2.7 WHAT ELSE IS IMPORTANT TO YOU? Do you have any other feedback on the draft Future Development Strategy?

No comment.

⁴ <https://www.mbie.govt.nz/dmsdocument/26909-measures-for-transition-to-an-expanded-and-highly-renewable-electricity-system-pdf>



Jointly Committed to Saving the Silverstream Spur for Future Generations

Wellington Regional Leadership Committee

Dear Wellington Regional Leadership Committee.

Our group is seeking the inclusion of a late submission (this letter) under Section 37A 1 B of the RMA (or by any other means) as we represent part of the community that enable adequate assessment of the Future Development Strategy as all groups will be effected by other submissions made to the FDS.

Our group is made up of members of the management committees of Forest and Bird Upper Hutt Branch, Save Our Hills Inc, and Silver Stream Railway Inc, who jointly over the previous 2 years (and individually for many years prior) have lobbied to ensure the protection of the Upper Hutt City Council owned Silverstream Spur Reserve from any form of development, with recent efforts focused on opposing the construction of a road/infrastructure corridor to service the Southern Growth Area (SGA) on the spur, a separate piece of reserve land.

All three groups, along with a large number of members of the community all made submissions during the Upper Hutt City Council (UHCC) Plan Change 49 Variation 1 process, supporting the rezoning of the Spur to Natural Open Space, with all but 3 submissions specifically opposing the construction of a transport/infrastructure corridor on the Spur to service the SGA. At the hearing held in front of the independent hearing commissioners held 27-30 November 2023, the group were disappointed to learn that both Guildford Timber Company (GTC), and Upper Hutt City Council (UHCC) submitted to the FDS seeking to include the SGA in the FDS. This is despite the draft strategy that our groups reviewed, not including the SGA, and the latest HBA figures adopted by UHCC in August showing a sufficiency of housing capacity.

Aside from the other issues relating to the SGA such as storm water runoff, access and lack of supporting infrastructure, and the destruction of indigenous biodiversity, our groups consider that while the decision of accessing the SGA through the Silverstream Spur is still being considered, and has therefore not been decided, then the SGA should NOT be included in the FDS for the Wellington Region. It is also considered, as is stated in the draft strategy, that sufficient capacity exists now that the Intensification Planning Instrument has been adopted by UHCC, and in line with the NPS-UD policies 1 and 3 in particular, the SGA does not meet the threshold for being included in the FDS.

Relief Sought: The joint group of Forest and Bird Upper Hutt Branch, Save our Hills Inc, and Silver Stream Railway Inc, seek that the Southern Growth Area is continued to be excluded from the Wellington Regional Leadership Committee Future Development Strategy and the groups support the parts of the strategy that seek to restrict Greenfields development in the Hutt Valley aside from what was indicated in the draft strategy. The groups submit that the WRLC reject the submissions of the GTC and the supporting submission from the UHCC that seek to include the SGA in the FDS, as

Upper Hutt already has more than sufficient realisable housing capacity to meet short, medium and long term growth in the city and the SGA does not meet the policy's required to warrant inclusion in the FDS. Rejecting of the GTC and UHCC submissions is in keeping with the group's objective of keeping the Silverstream Spur free from any form of development and keeping it as Natural Open Space for future generations to enjoy.

We would appreciate your favourable consideration of this late submission in light of the large amount of community interest in this matter over an extended period of time. If this submission is included we would appreciate the opportunity to appear at the hearing in support of this submission.

Yours Sincerely



Jason Durry

Acting General Manager

Silver Stream Railway Inc

On behalf of Forest and Bird Upper Hutt, Save Our Hills Inc, and Silver Stream Railway Inc.