



---

***The Lines Company Limited***  
***Feedback on the draft Waitomo District Long-Term Plan***  
***May 2021***

---

**To** Waitomo District Council  
Queen Street,  
PO Box 404,  
Te Kuiti 3941

Sent via email to: [haveyoursay@waitomo.govt.nz](mailto:haveyoursay@waitomo.govt.nz)

**FROM:** The Lines Company Limited (“TLC”)  
PO Box 281  
King Street East  
Te Kuiti 3941

Date **21 May 2021**

<b>Title</b>	Waitomo District Long-term Plan : TLC Feedback
<b>Address for Service</b>	Edison Consulting Group Ltd PO Box 875 Hamilton 3240 Attention –Tim Lester <a href="mailto:tim.lester@edison.co.nz">tim.lester@edison.co.nz</a>
<b>Organisations name</b>	The Lines Company Limited

## 1 Introduction

- 1.1 The Lines Company Limited ('TLC') owns and operates electricity distribution network assets and services over 18,000 customers and 24,000 connections throughout the King Country, Waitomo and Central Plateau.
- 1.2 TLC's network covers 13,700km<sup>2</sup> and stretches from Otorohanga in the north to Mt Ruapehu in the south.
- 1.3 Whilst most of TLC's connected customers are residential, TLC also supply electricity to major industrial businesses like the iron-sands mine at Taharoa and New Zealand's largest lime quarry at Oparure.
- 1.4 In providing electricity distribution line services, TLC operates and maintains:
- 4500km of lines
  - 35,000 power poles
  - 5000+ transformers
  - 30+ zone substations
  - 14 repeater sites to carry voice and data signals
  - 250 remote controlled switches
  - 10 load control points
- 1.5 TLC is committed in its regulatory obligation to provide consumers with a safe, effective and secure supply of electricity.
- 1.6 Waitomo District Council's proposed (draft) 10 Year Plan represents a strategic document TLC considers has the potential to indirectly influence electricity supply services to local communities.
- 1.7 Whilst there may appear to be little direct relevance to TLC's network utility operations in the primary purpose of the long term plan (such that TLC's infrastructure is not Council-owned infrastructure), the environmental context and high-level messaging in which the long term plan directs Council's strategic decisions can have an incidental effect on the effective delivery of TLC services – particularly in lower-level planning documents such as the Waitomo District Plan.
- 1.8 It is in the context of this indirect effect of the long term plan that TLC wish to provide feedback on the document – *The Journey Ahead – Te Haerenga Kei Mua'; Draft 10 Year Plan 2021–31.*

---

Waitomo Council Draft Long-Term Plan

---

**2 LTP Feedback**

- 2.1 Waitomo District Council (WDC or Council) has notified the Draft Long-term Plan 2021–2031 and are currently receiving feedback from the community.
- 2.2 Council’s 2021–2031 Long Term Plan (‘LTP’) is a high-level strategic document notifying the community how, where and why Council propose to direct financial resources over the next 10 year period.
- 2.3 In particular, the Objective of the LTP is “*Waitomo — a vibrant district*”, and has been framed around Environmental, Social, Cultural and Economic issues and challenges, and sets in place the desired outcomes for the Waitomo District.
- 2.4 TLC fundamentally supports the function of long term plans (as a strategic planning and financial transparency tool). The primary basis for this support and interest in providing this feedback is that such high-level planning documents can assist in guiding the strategic direction and decision making process for TLC’s network assets - particularly in the key areas of resilience, and providing suitable levels of electricity distribution service to meet the consistently changing business and residential communities’ requirements.
- 2.5 TLC’s recognition of Council’s strategic documents is evident by not only this LTP submission, but also on a number of preceding submissions TLC have made to the District’s Urban Growth Plans which will underpin the current Proposed Waitomo District Plan Review process.
- 2.6 TLC acknowledge that the feedback currently being sought by WDC will be used to shape a 10 year strategic document that is inclusive of community consultation. The finalised LTP will further define identified projects, and their funding, that have been proposed to satisfy Council’s desired environmental outcomes over the next decade – particularly in regard to making Waitomo more resilient, vibrant and competitive.
- 2.7 TLC has identified key areas in both the draft LTP and its associated Infrastructure Strategy (‘IS’) in which the secure supply of electricity is a relevant consideration. Consequently, the key messaging of TLC’s feedback is intended to highlight issues and opportunities whereby appropriate recognition should be provided in the document regarding the role and function of critical network utility operators.
- 2.8 The key messages TLC seek to have included in the finalised LTP and associated Infrastructure Strategy broadly relate to;

*Resilience*  
*Infrastructure*  
*Urban Development*

*Resilience and Infrastructure*

- 2.9 TLC own and operate networks of electrical lines, cables and substations throughout the Waitomo District. Operating and maintaining these networks in a well-planned, efficient and cost effective manner is of paramount strategic and statutory importance to TLC so as to ensure that obligations under the 1986 Commerce Act, 1992 Electricity Act, and various electricity regulations are met.

Implicit in these operations is the on-going requirement to make the network more resilient to the effects of natural hazards.

- 2.10 A challenge discussed in Council's LTP consultation document is that of ensuring the Waitomo District is resilient to *Climate Change* - natural hazards. Specific mention in the document is given to three waters infrastructure upgrades that Council are proposing to allocate funding towards – for instance, improvements to water storage and wastewater capacity, as well as upgrading to existing infrastructure such as stormwater.
- 2.11 TLC agree with Council that such infrastructure priorities are important in making the District more resilient to natural hazards; however, it is considered that appropriate acknowledgement of non-council infrastructure also needs to be provided for in the final LTP and *IS* regarding resilience.
- 2.12 Core infrastructure, such as TLC's electricity distribution network, is a lifeline utility that is integral when considering infrastructure resilience projects across the District. To make this point clear, three waters networks are in most instances dependant on a secure supply of electricity (i.e., pump stations, control gates, plant and machinery), and consequently require an appropriate level of recognition in the LTP, and also within the 2021-2051 *IS*.
- 2.13 TLC consider that in isolation there is limited benefit in building a more resilient three waters network if the electricity network is not equally resilient so that pumping stations can function after, for instance, an earthquake. TLC further contends that a perceived lack in co-ordination of planning resilience projects will result in suboptimal investment outcomes.
- 2.14 It is acknowledged that under the Local Government Act the purpose of a LTP is (amongst other things) to provide transparent information regarding public infrastructure and investment within the District. However, where the draft LTP consultation documents requests feedback on challenges relating to resilience and infrastructure, TLC considers that greater, more explicit, provision is presented in the strategies for inter-relationships with non-council owned core infrastructure which are instrumental in servicing public infrastructure.
- 2.15 As stated in the LTP's associated infrastructure strategy a key outcome is – "*Focus on renewing and maintaining critical, core infrastructure.*"
- 2.16 TLC contend that adequately reflecting the importance of support infrastructure in Council's identified three waters capital investment projects is appropriate – as without the means to provide for a resilient electricity distribution network, then the ability to strategically *renew and maintain core infrastructure* as proposed in the draft Infrastructure Strategy will not be holistically reflected in the document.
- 2.17 In regard to another area of resilience (being emergency management), TLC would like Council to consider referencing in the Infrastructure Strategy the potential for emergency overhead 11kV electricity cable routes as a cost efficient means to providing robust infrastructure protection, and wider natural hazard resilience across the District's main urban areas.
- 2.18 The purpose of the *IS* is:
- (a) *To identify significant infrastructure issues for Waitomo District Council (WDC) over the period covered by the strategy, and*
  - (b) *To identify the principal options for managing those issues and the implications of those options.*
- 2.19 Such emergency corridors would represent strategic 'pathways' through the District's main urban

areas that are reserved for the rapid re-establishment of linear infrastructure services in the event that a natural hazard significantly disrupting the existing network operation.

- 2.20 In acknowledging the concept of such emergency corridors TLC contend that the LTP/*IS* can be assisted in addressing infrastructure resilience challenges with an appropriate and pragmatic solution, at least in part, to one of the Infrastructure Strategies central objectives.

### *Urban Development*

- 2.21 TLC are interested in the strategic direction being proposed by Council in regard to housing land budgets, as well as laying foundations for sustainable urban growth and development.
- 2.22 The LTP consultation document and *IS* makes repeated reference to the District's static, or otherwise declining population growth (as derived from growth projections undertaken for WDC back in June 2017). Whilst the *IS* indicates that more recently revised population projections have been taken into account for the purpose of the next *IS* 30 year period – Council have indicated in the *IS* that such projections do not vary significantly from those back in 2017.
- 2.23 As an observation, TLC consider that the LTP and *IS* have not robustly 'factored in' industry growth and technological changes that are occurring within the District - and how such elements can potentially influence, or stimulate, urban growth through employment opportunities and subsequent housing demand.
- 2.24 TLC is continuing to experience significant industrial growth in their network, and therefore are bringing forward the requirement for capacity upgrades, and preparing significant engineering resources to support large-scale customer projects.
- 2.25 TLC would like Council to note the growth in electricity demand (or step load growth) for industrial sites is driving significant upgrading to their 11kV network across the District, and specifically cite growth such as *Omya / Ravensdown limestone processing plants, Taharoa Iron Sands Mine, Crusader Meat Processors, Te Kuiti Meats, Universal beef, Waitete Sawmill, Tregouths Sawmill and Graymont Quarries* as examples.
- 2.26 Such significant industrial developments are considered to be worthy of mention in the LTP and *IS* in regard to the potential flow on effect that can result from industrial growth/expansion within the District and the consequential effects on urban development.
- 2.27 Notwithstanding the rate of population growth or decline, TLC consider that Council - in providing for the District's demographic changes - is likely to enter even more so in to partnering with developers and other housing providers, as well as working with central government to explore infrastructure funding options for maintenance and/or development.
- 2.28 TLC consider it necessary for the LTP and *IS* to more explicitly recognise at a high-level *all* core infrastructure provision and maintenance for housing and sustainable growth (not concentrating solely on Council-owned infrastructure), and furthermore, that such core infrastructure providers are to be meaningfully consulted in advance regarding urban developments within the District.
- 2.29 Further to this recognition, TLC also wish to note that they are beginning to see changes in the way their customers (residential and industrial) use energy. The two most immediate changes, and impacts, are the installation of solar technology on homes, and the emergence of electric vehicles

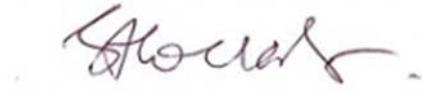
and their charging infrastructure. At this stage the impacts on the TLC network are small; however, it is expected that these and other technology changes will make a significant difference in the way the TLC network is used, and as a consequence, how TLC may need to plan and adapt the electricity supply network operations to support this change.

- 2.30 In clearly recognising both Council and Non-Council owned infrastructure requirements for sustainable urban development, the Infrastructure Strategy (and LTP) will appropriately portray not only the challenges in upgrading and maintaining the communities Level of Service for infrastructure provision, but also will assist in informing the wider community how Council propose to meet principal options for managing infrastructure related issues.
- 2.31 TLC seek that the final LTP and IS broadens recognition in the challenges and desired outcomes in regard to maintaining urban development (including industrial growth and technological advances) to include that of core network utility infrastructure providers. By appropriately acknowledging the role and function organisations such as TLC play in the planning for urban development within the District, a more transparent and contiguous policy direction will be provided in the LTP for future implementation – particularly in Council plans and policies such as the Waitomo District Plan.
- 2.32 TLC has provided numerous submissions to Council in regard to urban growth strategies, and will continue to do so in regard to the Notified Proposed Waitomo District Plan. For the reasons indicated above, TLC support such a strategic approach to urban management in the LTP/IS; however, an appropriate level of recognition of all infrastructure variables and context should be provided.
- 2.33 In consideration of the above TLC seek that additional comment is provided in the LTP's Infrastructure Strategy to the extent that:
- a. *Ensuring recognition of the District's electricity distribution networks is provided in the LTP and IS.*
  - b. *Recognition of TLC as a development partner in regard to infrastructure provision, and meeting the desired environmental objectives for sustainable urban development.*
- 2.34 TLC are supportive of the LTP and IS purpose, and acknowledge that many of the document's objectives will be implemented through Council's impending District Plan review process. However, for the reasons addressed above, TLC seeks that high-level strategic documents appropriately recognise the role that network utility operators play in addressing infrastructure challenges to ensure that a consistent message is presented in Council's strategic thinking.

### **3 Conclusion**

- 3.1 TLC acknowledge the importance of clear and transparent communication associated with delivering Council's 2021-2031 LTP and 2021-2051 IS.
- 3.2 In recognition of this importance, TLC has provided the above high-level feedback to Council so that such communication adequately reflects perspectives from the District's electricity distribution provider.
- 3.3 The feedback provided by TLC is intentionally high-level, yet appropriate reasoning has been provided to Council to ensure the intended *Resilience* and infrastructure *Level of Service* elements are carried through to the finalised LTP and associated strategic document chain.

Signature

A handwritten signature in dark ink, appearing to read "Hollart", with a long horizontal flourish extending to the right.

Tony Hollart  
Asset Strategy Manager