



The Lines Company Limited
Feedback on the Proposed Waitomo District Plan
December 2022

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

Sent via email to: districtplan@waitomo.govt.nz

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

Date **21 December 2022**

| | |
|----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Title | Proposed Waitomo District Plan: TLC Feedback |
| Address for Service | Edison Consulting Group Ltd PO Box 875 Hamilton 3240 Attention –Tim Lester tim.lester@edison.co.nz |
| Organisations name | The Lines Company Limited |

1 Introduction

- 1.1 The Lines Company ('TLC') appreciates the on-going opportunity to be involved with the Waitomo District Council's comprehensive District Plan review process.
- 1.2 TLC understand that the District Plan Review process is being undertaken in phases - with this stage being the Notified Proposed Waitomo District Plan ('PDP').
- 1.3 TLC has provided preliminary feedback throughout the PDP development - as far back as March 2019 - and are pleased to see that many points made in the earlier feedback have been adopted into the notified PDP.
- 1.4 TLC sought to have key electricity distribution substation sites be designated as part of the district plan review process. Based on the effects assessment with these retrospective Notices of Requirement, TLC are pleased to see each of these existing substation sites being designated within the PDP.
- 1.5 This submission has been prepared in consideration of the Schedule 1 process of the Resource Management Act (1991) - and therefore legally confirms TLC's feedback on the notified PDP as set out below.

About TLC

- 1.6 In order to provide some context to this Waitomo District Council PDP submission - TLC own and operate electricity distribution network assets and services over 18,000 customers and 24,000 connections throughout the King Country, Waitomo and Central Plateau.
- 1.7 TLC's network covers 13,700km² and stretches from Otorohanga in the north to Ohakune in the south.
- 1.8 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.
- 1.9 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
- 1.10 TLC is committed in its regulatory obligation to provide consumers with a safe, effective and secure supply of electricity.

Lifeline Utility

- 1.11 In addition to being defined as a Network Utility Operator in the Resource Management Act, TLC also provides Lifeline Utility Services.
- 1.12 The Civil Defence and Emergency Management (CDEM) Act 2002 stipulates the responsibilities and roles of key organisations that provide an *essential service* within New Zealand. TLC’s core business is electricity distribution, and hence is an *essential service* under the CDEM Act; consequently, TLC’s assets are statutorily classified as a *Lifeline Utility*.
- 1.13 As a Lifeline Utility asset owner, TLC must ensure that their network is able to function to the fullest possible extent (even at a diminished capacity level) during and after a natural hazard emergency.
- 1.14 As a consequence of this statutory responsibility TLC have a significant interest in the Waitomo PDP so as to ensure their operational environment has appropriate regulatory settings so as to deliver a safe and secure supply of electricity to Waitomo businesses and communities.

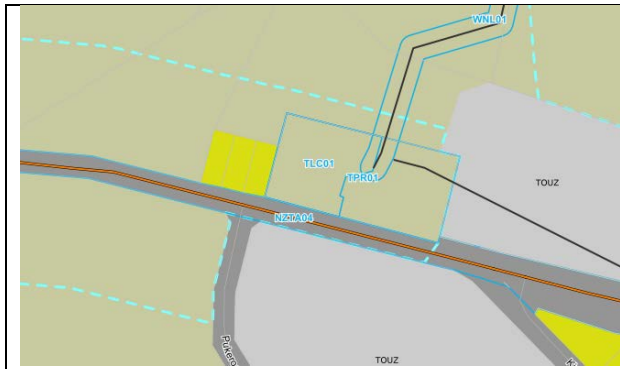
2 Waitomo District Plan Review

- 2.1 Since 2019 the Waitomo District Council (‘Council’) has undertaken ‘rolling’ consultation in regard to their comprehensive District Plan Review process. TLC has been a contributor to these preliminary stages – with a particular emphasis being placed on the provisions for Network Utility infrastructure.
- 2.2 TLC is pleased to see that many elements of their preliminary feedback have been ingrained into the notified PDP – TLC are obviously in support of such provisions and seek their retention.
- 2.3 As will be submitted - TLC are supportive of the electricity distribution network zone substation designations that have been included within the PDP, and are appreciative that these designations were included through a retrospective Notice of Requirement opportunity that was enabled through the review process.
- 2.4 TLC has reviewed the notified PDP and - in particular - the provisions relative to the Waitomo Districts’ electricity distribution network. Based on this review a submission table has been prepared in relation to the content and wording presented in the PDP; furthermore, a level of support or opposition has been provided in relation to the selected proposed provisions. Comments in relation to this support have been provided, as well as recommendations being put forward by TLC in regard to sought amendments to the proposed provisions.

3 Substation Designations

- 3.1 The following section addresses Chapter 55 of the PDP, and confirms the location, description, and purpose of the designations as they relate to TLC’s key substation sites:

| <i>Proposed Designation</i> | | <i>Submission</i> |
|-------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Hangatiki Zone Substation | | <p>TLC can confirm that the Hangatiki Zone Substation property information is correct.</p> <p>Planning Map notation confirmed and agreed.</p> <p>Cadastral boundary confirmed and agreed.</p> <p>TLC seek that designation TLC01 is retained as currently proposed.</p> |
| Designation unique identifier | TLC01 | |
| Designation purpose | Electricity supply purposes | |
| Site identifier | Delineated area within Lot 2 DPS 71444 (RT: SA57B/801) Waitomo Caves Road, Hangatiki | |
| Lapse date | Given effect to (i.e. no lapse date) | |
| Designation hierarchy under section 177 of the Resource Management Act | Secondary | |



| Piripiri Zone Substation | |
|-------------------------------------------------------------------------------|-------------------------------------------------------|
| Designation unique identifier | TLC02 |
| Designation purpose | Electricity supply purposes |
| Site identifier | Lot 1 DP 431716 (RT: 522338) Te Anka Road, Te Anka |
| Lapse date | Given effect to (i.e. no lapse date) |
| Designation hierarchy under section 177 of the Resource Management Act | Primary |



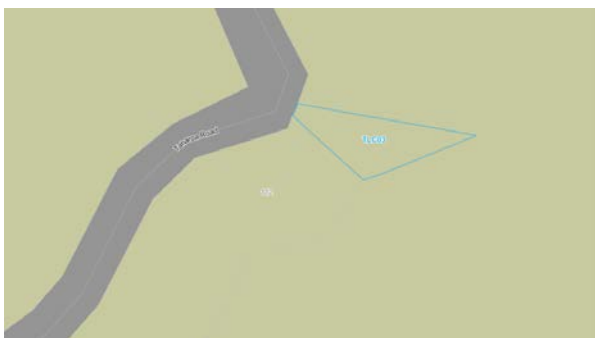
TLC can confirm that the Piripiri Zone Substation property information is correct.

Planning Map notation confirmed and agreed.

Cadastral boundary confirmed and agreed.

TLC seek that designation TLC02 is retained as currently proposed.

| Te Anka Zone Substation | |
|-------------------------------------------------------------------------------|-----------------------------------------------------------|
| Designation unique identifier | TLC03 |
| Designation purpose | Electricity supply purposes |
| Site identifier | Lot 1 DP 431301 (RT: 521015) 112 Taharoa Road, Te Anka |
| Lapse date | Given effect to (i.e. no lapse date) |
| Designation hierarchy under section 177 of the Resource Management Act | Primary |



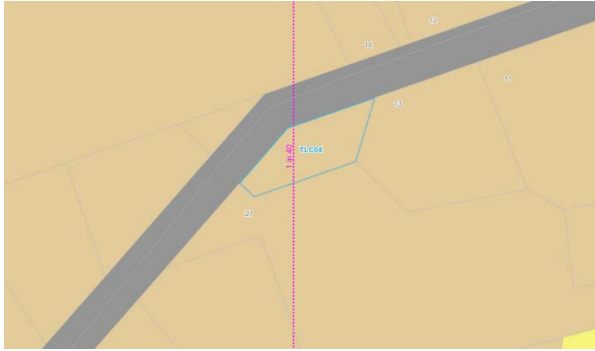
TLC can confirm that the Te Anka Zone Substation property information is correct.

Planning Map notation confirmed and agreed.

Cadastral boundary confirmed and agreed.

TLC seek that designation TLC03 is retained as currently proposed.

| Gadsby Road Zone Substation | |
|------------------------------------------------------------------------|--------------------------------------------------------------|
| Designation unique identifier | TLC04 |
| Designation purpose | Electricity supply purposes |
| Site identifier | Lot 3 DPS 14640 (RT: SA12C/1053) 15 Gadsby Road, Te Kūiti |
| Lapse date | Given effect to (i.e. no lapse date) |
| Designation hierarchy under section 177 of the Resource Management Act | Primary |



TLC can confirm that the Gadsby Road Zone Substation property information is correct.

Planning Map notation confirmed and agreed.

Cadastral boundary confirmed and agreed.

TLC seek that designation TLC04 is retained as currently proposed.

| Waitete Road Zone Substation | |
|------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|
| Designation unique identifier | TLC05 |
| Designation purpose | Electricity supply purposes |
| Site identifier | Part Lot 2 DPS 7194 (SA1797/62) Lot 1 DPS 7194 (SA13C/45) Lot 3 DPS 7194 (SA13C/46) 27 Waitete Road, Te Kūiti |
| Lapse date | Given effect to (i.e. no lapse date) |
| Designation hierarchy under section 177 of the Resource Management Act | Primary |




TLC can confirm that the Waitete Road Zone Substation property information is correct.

Planning Map notation confirmed and agreed.

Cadastral boundary confirmed and agreed.

TLC seek that designation TLC05 is retained as currently proposed.

| Waitete Road Zone Substation | |
|--------------------------------------------------------------------------------------|--------------------------------------------------------------|
| Designation unique identifier | TLC06 |
| Designation purpose | Electricity supply purposes |
| Site identifier | Lot 3 DPS 80846 (RT: SA65C/176) 30 Waitete Road, Te Kūiti |
| <i>Draft Waitomo District Plan Part 3 – Area Specific Matters – Designations</i> | |
| Page 50 of 75 | |
| | |
| Lapse date | Given effect to (i.e. no lapse date) |
|  | |

TLC can confirm that the Waitete Road Zone Substation property information is correct.

Planning Map notation confirmed and agreed.

Cadastral boundary confirmed and agreed.

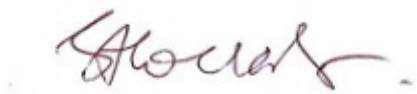
TLC seek that designation TLC06 is retained as currently proposed.

4 Summary

- 4.1 Consultation documents and public meetings have been undertaken across the Waitomo District in regard to the review of the Waitomo District Plan, to which a Proposed Waitomo District Plan has been notified for public submissions.
- 4.2 As a Lifeline Utility organisation, TLC has provided this submission on the PDP as it relates to provisions that could have an impact on the safe and secure delivery of the District's electricity distribution network's – as well as its operation and on-going development.
- 4.3 TLC is happy to provide clarification of any issue covered in this submission.

- TLC could not gain an advantage in trade competition through this submission.
- TLC is not directly affected by an effect of the subject matter of the submission that:
 - (a) adversely affects the environment; and
 - (b) does not relate to trade competition or the effects of trade competition.
- TLC wish to be heard in support of their submission.
- TLC will consider presenting a joint case with other submitters, who make a similar submission, at a hearing.

Signature for The Lines Company Limited:

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

Tony Hollart

Asset Strategy Manager

| SECTION OF PLAN | SPECIFIC PROVISION | SUPPORT/SUPPORT IN PART/OPOSE | REASON FOR SUBMISSION | RELIEF SOUGHT <i>Text to add shown as <u>underlined</u></i> <i>Text to delete shown as strikethrough</i> |
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| Definitions | | | | |
| Definitions | <p>Network utility operator</p> <p><i>has the same meaning as in s166 of the RMA:</i></p> <p>...</p> | Support | TLC support this definition as it is appropriately taken from the Resource Management Act 1991 – and hence is unambiguous in its interpretation. | Retain the definition as currently drafted. |
| | <p>Regionally Significant Infrastructure</p> <p>...</p> <p><i>(e) a network (as defined in the Electricity Industry Act 2010);</i></p> | Support | <p>The Electricity Industry Act 2010 defines ‘a network’ as:</p> <p><i>“network means a distributor’s lines and associated equipment used for distribution.”</i></p> <p>The use of this definition is considered appropriate by TLC and therefore seeks that it is retained in the PDP.</p> | Retain the definition for Regionally Significant Infrastructure as currently proposed |
| | <p>maintenance (in relation to network utilities)</p> <p><i>means, in relation to network utilities, any work or activity necessary to continue the operation and/or functioning of existing infrastructure. It includes the repair and/or replacement of an existing line, pipe, building, structure,</i></p> | Support in part | Whilst TLC are generally supportive of this definition (as it includes the term replacement), it is considered that the currently drafted meaning could be interpreted as being unreasonably restrictive in that many aspects of the electrical distribution network (as well as other network utility equipment for that matter) involve replacing older, more bulky, equipment with newer, smaller and more efficient equipment which have been brought about – or evolved - | <p>TLC seek that the definition for the term ‘<i>maintenance</i>’ is amended as follows:</p> <p><i>means, in relation to network utilities, any work or activity necessary to continue the operation and/or functioning of existing infrastructure. It includes the repair and/or replacement of an existing line, pipe, building, structure, road or other asset with another of the same or <u>lesser</u> similar height, size, and scale within the same or similar position and for the same</i></p> |

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| | <p><i>road or other asset with another of the same or similar height, size, and scale within the same or similar position and for the same purpose. For the avoidance of doubt maintenance excludes upgrading, and the word 'similar' means 'almost identical'</i></p> | | <p>through technical innovation.</p> <p>From an electrical distribution perspective - a common example of replaced equipment being smaller is that of transformers commonly located within road reserve. Newer or replacement transformers are no longer housed within bulky shed-type structures, but rather are standalone, self-contained units within a significantly reduced envelope.</p> <p>TLC consider that technological advances in network utility infrastructure mean that maintaining equipment within the network with "similar" or "almost identical" equipment could be problematic, and furthermore will not recognise the positive environmental effects of smaller, more efficient infrastructure.</p> <p>TLC seek amendment to the definition to acknowledge the replacement for modern, smaller and more efficient network utility equipment.</p> | <p><i>purpose. For the avoidance of doubt maintenance excludes upgrading, and the word 'similar' means 'almost identical'</i></p> |
| | <p><i>New definition</i> <i>Infrastructure</i></p> | | <p>TLC note that the terms infrastructure, network utilities, and three waters infrastructure is used interchangeably throughout the PDP.</p> <p>In consideration of the use of the term, it is considered appropriate that the more inclusive term '<i>Infrastructure</i>' is defined.</p> | <p>TLC consider it appropriate to use the infrastructure definition contained within the RMA so as to add more clarity for users of the District Plan; consequently the following term is sought to be included within the PDP;</p> <p><u><i>Infrastructure:</i></u></p> |

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| | | | | <p><u>has the same meaning as in section 2 of the RMA:</u></p> <p><u>means—</u></p> <p><u>.....</u></p> |
| | <p>New definition</p> <p><i>Line</i></p> | | <p>The PDP refers to both underground and overhead lines in the document.</p> <p>Give the usage of the word, and to assist in providing greater certainty, it is considered appropriate to provide a definition for this term.</p> | <p>TLC consider it appropriate to include a definition for the term ‘Line’ as such a term is used throughout the draft WDP:</p> <p><u>Line</u></p> <p><u>means line as defined in section 2 of the Electricity Act 1992:</u></p> <p><u>a) _____ means works that are used or intended to be used for the conveyance of electricity.</u></p> |
| Network Utility Chapter 19 | | | | |
| NU-03. | <p><i>The national significance and benefits of the national grid and gas transmission network are recognised and provided for.</i></p> | Neutral | <p>This provision has been placed in Chapter 19 which provides provisions for Network Utilities.</p> <p>Whilst the National Grid and Gas Transmission infrastructure are network utilities - it is noted that Chapter 18 has been provided in the PDP expressly for the National Grid and Gas Transmission.</p> <p>TLC questions the applicability of this provision within Chapter 19; and whether or not it should be removed given similar objectives are already contained within</p> | <p>TLC <i>suggest</i> this objective be removed from Chapter 19 as the objective is already contained within Chapter 18.</p> <p>Relocating this Objective will be consistent with the opening paragraph of Chapter 19 (NEGT – O1 and O2 respectively).</p> |

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| | | | Chapter 18 (National Electricity and Gas Transmission - NEGT) to avoid redundancy. | |
| NU-R19. | <i>New overhead lines and associated poles or towers</i> | Support in part | <p>In the draft PDP consultation, TLC sought that clarification be provided to the extent that compliant poles or support structures within the road reserve do not require land use consent as Discretionary Activities if located within outstanding natural features or landscapes policy overlay areas.</p> <p>TLC consider that pole mounted equipment should be included with R19.</p> | <p>TLC support the inclusion of text in NU-R19 referring to overhead lines in all existing and proposed roads being compliant with the adjacent zone height restrictions.</p> <p>TLC seek that NU-R19 refer to: <i><u>New overhead lines and associated equipment, poles or towers</u></i></p> |
| NU-R43 | <p><i>Upgrading including realignment of existing underground network utilities</i></p> <p><i>1. The upgrading, realignment or relocation of an underground line, pipe (excluding a gas transmission pipeline), or ancillary structure is within 5 m of the existing alignment or location; or...</i></p> | Oppose | <p>TLC support in principle NU-R43 that upgrading and or realigning sections of network utility infrastructure is should be subject to performance standards; however, the environmental effects of <i>underground</i> network utilities will in most instances be negligible.</p> <p>The degree of realignment for underground infrastructure should not be subject to an arbitrary 5.0m spatial dimension – particularly in that such underground network utility infrastructure is a permitted activity in most locations (zones) across the Waitomo District.</p> <p>Without further explanation from Council in relation to the rationale behind, Rule NU-43, the current provision will be inconsistent with the permitted activity effects of new</p> | TLC seek that Rule NU-R43(1) is removed in its entirety. |

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| | | | underground infrastructure. | |
| NU-R44 | <p><i>Upgrading of existing above ground network utilities</i></p> <p><i>1. The realignment, relocation, or replacement of a pipe, pole, tower, conductor, cross arm, switch, transformer, ancillary structure or access track is within 5 m of the existing alignment or location; providing a pole is not replaced with a tower; and</i></p> | Support in part | <p>TLC consider the wording of Rule NU-R44 is generally appropriate and consistent with other district plans in the Waikato Region, and supports removal of the word 'line' from the standard as sought by TLC in the draft PDP feedback.</p> <p>Notwithstanding the above, TLC note that the PDP allows for new overhead lines to be developed as permitted activities subject to compliance with the applicable performance standards. In the event that a section of existing overhead line needs to be realigned in excess of 5m, TLC are uncertain that a Restricted Discretionary Activity should apply for a new pole that would otherwise meet the permitted height standards for the zone (as specified in NU-Table 2)?</p> <p>Council's clarification on this matter would be much appreciated.</p> | <p>TLC see the following amendment to Rule NU-R44 as currently drafted:</p> <p><i>1. <u>Where not otherwise identified as a permitted activity,</u> the realignment, relocation, or replacement of a pipe, pole, tower, conductor, cross arm, switch, transformer, ancillary structure or access track is within 5 m of the existing alignment or location; providing a pole is not replaced with a tower; and</i></p> |
| NU-R44 | <p><i>3. The diameter or width of a replacement pole:</i></p> <p><i>(i) Must not exceed twice that of the replaced pole at its widest point; or</i></p> <p><i>(ii) Where a single pole is replaced with a pi pole, the</i></p> | Support | TLC support NU-R44(3) as it reflects preliminary consultation feedback provided by TLC. | TLC seek that proposed Rule NU-R44(3) is retained as currently drafted. |

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| | width of the pi pole structure must not exceed 3 times the width of the replaced pole at its widest point or alternatively 4.2m as taken from the pole centres; | | | |
| NU-R44 | 8. Pole mounted transformers and voltage regulators not exceeding 3 m ³ and associated equipment are added to existing poles, except in the industrial, rural production, and general rural zones and roads directly adjoining these zones - where there is no maximum; and | Support | TLC support NU-R44(8) as it reflects preliminary consultation feedback provided by TLC. | TLC seek that proposed Rule NU-R44(8) is retained as currently drafted. |
| NU-R11 NU-R46. | Electricity generators and self-contained power units for the supply of a network utility 3. This rule does not apply to temporary diesel generators associated with a network utility, used during outages of electricity supply. Noise 3. Noise limits are not applicable to temporary diesel generators used in association with a network | Support | TLC support these rules as they will enable security of supply to be maintained in the event of either planned or unplanned outages. It is appropriate for diesel generators to be used as a responsive solution to outages. The use of such equipment ensures that TLC can continue to provide a consistent and resilient supply of electricity to Waitomo's businesses and communities. | TLC seek that Council retain these rules in the PDP as currently drafted. |

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| | <i>utility when operated for a duration not exceeding 48hours; and</i> | | | |
| 29 Subdivision | | | | |
| | <p>SUB-03</p> <p><i>Subdivision is serviced by infrastructure that has been planned, sequenced and provided for in an integrated manner and has sufficient capacity for the proposed development of the site.</i></p> | Support | <p>TLC support this objective as it provides plan users and developers with a clear understanding that subdivision within the Waitomo District needs to be coordinated with a safe and secure supply of electricity.</p> <p>The objective also advises plan users that the potential for network capacity constraints needs to be considered early in the design phase for subdivision developments so as to allow for network utility providers to plan for and implement any required upgrading prior to the creation of new records of title.</p> | TLC seek that SUB-03 is retained within the notified version of the Proposed Waitomo District Plan. |
| | <p>SUB-010.</p> <p><i>Subdivision is designed to avoid or mitigate any adverse effects on the operation, maintenance and access to established network utilities and regionally significant infrastructure.</i></p> | Support | As a Regionally Significant Infrastructure provider, TLC support this proposed objective as it directs plan users to consider the potential for reverse sensitivity effects | TLC seek that SUB-010 is retained within the notified version of the Proposed Waitomo District Plan. |
| | <p>SUB-P3(8).</p> <p><i>8. Compromise the efficient provision of established</i></p> | Support | TLC support SUB-P3(8) because reference to reverse sensitivity for Network Utilities and Regionally Significant Infrastructure is | TLC seek the retention of policy SUB-P3(8) as currently drafted. |

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| | <i>network utilities and regionally significant infrastructure; and/or</i> | | included. | |
| | SUB-P7. <i>Subdivision must be appropriately serviced by:</i> | Support in part | <p>TLC support in principle this policy; however, to provided additional clarity it is considered that the term ‘<i>infrastructure</i>’ is either defined under Section 9 of the PDP, or alternatively SUB-P7 provides explicit reference to Network Utility Infrastructure.</p> <p>TLC consider it appropriate that the notified Proposed District Plan clearly specify network utility infrastructure as well as Council infrastructure so as to ensure consideration is reflective of all applicable infrastructure provision.</p> | TLC seek that the term ‘ <i>Infrastructure</i> ’ is defined in Chapter 9 – or alternatively explicit reference to non-Council owned infrastructure is provided for (as well as Council’s three waters and transportation infrastructure). |
| | SUB-P32. <i>Manage the creation of allotments for the purposes of public works, network utilities or reserves to ensure that the allotment is a sufficient size to accommodate its required use.</i> | Support | <p>TLC support non-prescriptive allotment constraints as they relate to network utility infrastructure.</p> <p>Whilst some subdivision design standards will be applicable to electricity distribution facilities (i.e., substations), many standards are not (i.e., outdoor living areas, amenity, access design etc.).</p> <p>Appropriate recognition in the subdivision policies of the draft WDP for Network Utility Operators is welcomed by TLC.</p> | TLC seek that policy SUB-P32 is retained as currently worded in the notified PDP. |

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| | <p>SUB-R18.</p> <p><i>Allotment configuration and utilities</i></p> <p>..</p> <p><i>3. Except in the Te Maika precinct (PREC7), every allotment must have provision for electricity connections; and</i></p> | Support in part | <p>As previously commented on as part of the draft PDP feedback - TLC support the intent of this Rule; however, to provide greater certainty it is considered that sub clause 3 of SUB-R18 should include wording to the effect that electricity infrastructure connections should be in place prior to the new titles being issued.</p> <p>Use of the words “must have provision for electricity connections...” is unclear and could be open to interpretation by plan users. To ensure that plan users clearly understand that electricity connections are to be in place prior to new land titles being deposited with LINZ – the wording for this rule should be made more explicit.</p> | <p>TLC seek the following amendments are made to proposed Rule SUB-R18(3):</p> <p><i>3. Except in the Te Maika precinct (PREC7), every <u>new</u> allotment must have provision for <u>electricity connections in place to the boundary of the allotment prior to the Record of Title being issued</u>; and</i></p> <p>Or wording to similar effect.</p> |
| Appendices | | | | |
| APP-5.1 | <p><i>To enable all or part of a future urban zone to transition into re-zoned land, a comprehensive and integrated structure plan must be developed which addresses, as appropriate, the following matters:</i></p> <p>...</p> <p><i>4. The future servicing needs of the area and the provision of adequate, coordinated and</i></p> | Support in part | <p>TLC support the items specified in Appendix 5 (Structure Plan Requirements) as they would relate to the future urban zone or other greenfield development growth cell areas.</p> <p>The provision of services to such growth areas need to be clearly understood by TLC so as to align network asset management as well as to forecast the required upgrading in TLC’s asset management plan.</p> <p>Notwithstanding the above support, and consistent with the feedback presented above, TLC consider that it is appropriate for</p> | <p>TLC consider it appropriate and worthwhile that the term infrastructure is defined within Chapter 9 of the PDP.</p> <p>In the event Council wishes not to define this term, then TLC seeks that all infrastructure provision is explicitly identified (i.e., Council-owned and non-Council owned infrastructure).</p> |

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| | <p><i>integrated infrastructure to serve those needs; and</i></p> <p><i>5. The nature and timing of any necessary infrastructure, how this infrastructure is to be developed and funded and whether the infrastructure will be implemented prior to development or as part of the development process; and</i></p> | | <p>the term '<i>Infrastructure</i>' to either be defined in the definition section of the PDP; or, alternatively provide explicit reference to both Council owned infrastructure as well as network utility infrastructure.</p> | |