

**WEL Networks Limited - Hearing Evidence**  
**Proposed Waikato District Plan:**  
**Hazardous Substances & Contaminated Land**

**1. Introduction**

- 1.1 My name is Karleen Broughton and I am Commercial Legal Counsel at WEL Networks Limited (“WEL”). I hold Bachelor of Laws and Bachelor of Arts degrees from the University of Auckland.
- 1.2 I have worked as a solicitor for 22 years, 13 of those within the electricity industry. Since 2017, I have worked in-house in the electricity distribution sector.

**2. WEL Networks Limited**

- 2.1 WEL is an electricity distributor operating under the Electricity Act 1992, who owns, operates and develops electricity distribution infrastructure in the Waikato Region to provide line function services to approximately 91,000 installation connection points. This includes the distribution of electricity to residences and businesses within the Waikato District.
- 2.2 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 is also an approved requiring authority pursuant to section 167 of the RMA for its lines network functions.

**3. WEL’s overall position on the Proposed Waikato District Plan**

- 3.1 WEL’s electricity and telecommunication infrastructure supports the sustainable management and efficient use of natural and physical resources as promoted in Part 2 of the RMA.
- 3.2 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.
- 3.3 The benefits of WEL’s electricity and telecommunication infrastructure in achieving sustainable management are also enshrined in the RMA through section 7(b) and 7(ba) that, in achieving the purpose of the RMA, requires particular regard be given to “the efficient use and development of natural and physical resources” and “the efficiency of the end use of energy”.
- 3.4 WEL is generally supportive of the approach and overall content of the Proposed Waikato District Plan (“Proposed Plan”). However, WEL submits that amendments are required to enhance the provisions within the Proposed Plan to provide for the importance of electricity and telecommunication infrastructure as provided in Part 2 of the RMA.

#### 4. Specific Provisions Supported by WEL

- 4.1 WEL supports the Hazardous Substances, Contaminated Land and GMOs section of the Proposed Plan as recommended in the Council Planner's Section 42A Report, and as set out in the table below.

WEL's Submission Point	Provision
Chapter 8 – Hazardous Substances, Contaminated Land and GMOs	
692.39	10.1.1 Objective – Effects of hazardous substances
692.59	10.1.2 Policy – Location of new hazardous facilities
692.60	10.1.3 Policy – Residual risks of hazardous substances
692.61	Policy 10.1.4 – Reverse sensitivity effects
692.40	Objective 10.2.1 – Contaminated Land
692.62	Policy 10.2.2 – Managing the use of contaminated land

- 4.2 WEL supports the amendments to Objective 10.1.1, Policy 10.1.2, Policy 10.1.3, Policy 10.1.4, Objective 10.2.1 and Policy 10.2.2 as notified in the Proposed Plan and retained in Council Planner's Section 42A Report.
- 4.3 The proposed amendments will continue to ensure clear direction for hazardous facilities and contaminated land in accordance with the National Environmental Standard.

#### 5. Conclusion

- 5.1 WEL supports recommendations made in the Council Planner's Section 42A Report on the Proposed Plan as outlined in Section 4 of my evidence.
- 5.2 Overall, the Proposed Plan reflects sound resource management principle and practice and will achieve the purpose of the RMA.

Dated 13 December 2019



**Karleen Broughton**  
WEL Networks Limited