

**NOTICE OF FURTHER SUBMISSION BY THE OIL COMPANIES TO THE NEW PLYMOUTH DISTRICT
COUNCIL'S PROPOSED DISTRICT PLAN
CLAUSE 8 OF THE FIRST SCHEDULE OF THE RESOURCE MANAGEMENT ACT 1991**

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Hereafter referred to as "the Oil Companies"

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File ref: AA5134

1. The Oil Companies' further submissions are as contained in the attached Table.
2. The Oil Companies have an interest in the proposed plan greater than that of the general public.
3. The Oil Companies do wish to be heard in support of their further submissions.
4. The Oil Companies could not gain an advantage in trade competition through their further submissions.
5. If others make similar submissions the Oil Companies may be prepared to consider presenting a joint case with them at any hearing.

Dated at AUCKLAND this 25th day of August 2020



Georgina McPherson
Principal Planning and Policy Consultant
4Sight Consulting Ltd

Sub No	Submitter	Proposed Plan Provision	Decision Request	Position of further submitter	Reason for Oil Companies' Further Submission and Relief Sought
563.18	Kāinga Ora - Homes and Communities	Definitions / ANCILLARY STRUCTURE	Amend the definition for ancillary structure as follows: ancillary structure accessory building: means a structure which is subordinate or subsidiary to the principal activity on-site. <u>means a detached building, the use of which is ancillary to the use of any building, buildings or activity that is or could be lawfully established on the same site, but does not include any minor residential unit.</u>	Oppose	Oppose submission and seek retention of the definition of ancillary structure as notified. This term is used in relation to network utilities and infrastructure to refer to structures associated with those facilities that are distinct to accessory buildings.
563.78	Kāinga Ora - Homes and Communities	Definitions / LIVING ACTIVITIES	Delete the definition for living activities in its entirety and use 'Residential Activity' instead.	Oppose in part	Not opposed to deletion of the definition of 'living activities' provided appropriate consequential amendments are made. That includes in relation to the definition of 'sensitive activities', which may require consequential amendment to ensure the activities specifically listed in the current definition of 'living activities' (as follows), which are considered sensitive to risk from significant hazardous facilities, continue to be covered by the 'sensitive activities' definition: <ul style="list-style-type: none"> • Residential activities; • Residential units; • Minor residential units; • Multi-unit developments; • Pa/Marae; • Papakāinga housing; • Retirement villages; • Boarding houses; and • Supported residential care.
570.1	LPG Association of New Zealand	Definitions / MAINTENANCE AND REPAIR	Amend the definition for maintenance and repair as follows: <u>...means in relation to significant hazardous facilities,</u>	Support	Support the intent of the submission to include reference to significant hazardous facilities in the definition of 'maintenance and repair' and amend the definition as sought. Such an amendment will clarify the scope of 'maintenance and

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			<u>any work or activity necessary to continue the operation and/or functioning of an existing significant hazardous facility. It does not include upgrading.</u>		repair' where this term is used in relation to significant hazardous facilities.
487.14	The Royal Forest and Bird Protection Society of New Zealand Incorporated	Definitions / MAINTENANCE AND REPAIR	Amend the definition for maintenance and repair to clarify within the definition that the footprint and scale of the existing structure or activity must stay the same.	Oppose	Oppose the submission and do not make the changes sought. It is considered overly restrictive and potentially unrealistic to require the footprint and scale of an existing structure or activity stay exactly the same, when undertaking maintenance and repair activities. In many cases, maintenance and repair involves replacement of components with modern equivalents, which may be of a slightly different size or shape. Further, in the case of pipe replacement, this typically involves installation of a parallel line before cutting over and removing the old one, with the implication that such works cannot practically remain within exactly the same footprint. Such a requirement would be particularly problematic if the definition is amended (as per sub 570.1) to apply to significant hazardous facilities as a whole, where maintenance and repair across a facility as a whole may practically require changes to the footprint or scale of component parts.
548.16	Greymouth Petroleum Limited	Definitions / SENSITIVE ACTIVITIES	Retain the definition for sensitive activities as notified.	Support	Allow the submission and retain the definition of sensitive activities as sought.
570.24	LPG Association of New Zealand	Definitions / UPGRADING	Amend the definition for upgrading as follows: for network utilities, means increasing the carrying capacity, efficiency, security, or safety of a network utility, where it does not result in a permanent change to the location of a structure. <u>for significant hazardous facilities, means increasing the efficiency, security, or safety of a significant</u>	Support in part	Support the intent of the submission to clarify the scope of 'upgrade' as it relates to significant hazardous facilities, as the term 'upgrade' is used in a number of plan provisions relating to significant hazardous facilities. However, as detailed in Oil Company submission 551.87, the Oil Companies consider some limited increase in the storage of hazardous substances should be provided for within the scope of upgrade works. The definition of upgrade should be amended only if provision is

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			<u>hazardous facility, where it does not result in an increase in the storage of hazardous substances on the site.</u>		made for some limited increase in the volume of hazardous substances stored on a site.
543.18	Taranaki Energy Watch Incorporated	Definitions / New definition / UNACCEPTABLE RISK	Add a new definition for unacceptable risk as follows: Unacceptable risk (for significant hazardous facilities provisions) means exposure of sensitive activities (including residential dwelling) to an individual fatality risk level exceeding 1 x 10 ⁻⁶ per year.	Oppose	The Oil Companies do not support including a definition for 'unacceptable risk' and seek the submission be disallowed. Risk associated with Significant Hazardous Facilities (SHF) may not necessarily be measured in terms of individual fatality risk (e.g. freezing works, wastewater treatment plants, milk processing plants, all of which are included in the definition of SHF) and/or quantitative risk assessment may not necessarily be warranted for all SHFs. There are other methods of risk assessment that may be more appropriate to a specific SHF, such as qualitative assessment, societal risk assessment or the BowTie approach. The term 'unacceptable risk' should not be restricted, by definition, as being limited to the 1 in one million individual fatality risk contour. Unacceptable risk can also arise with some land uses other than just sensitive activities.
525.28	Port Taranaki Limited	UFD / Strategic Objectives / UFD-13	Retain strategic objective UFD-13 as notified.	Support	Allow the submission and retain strategic objective UFD-13 as notified.
525.29	Port Taranaki Limited	UFD / Strategic Objectives / UFD-19	Retain strategic objective UFD-19 as notified.	Support	Allow the submission and retain strategic objective UFD-19 as notified.
525.30	Port Taranaki Limited	UFD / Strategic Objectives / UFD-21	Retain strategic objective UFD-21 as notified.	Support	Allow the submission and retain strategic objective UFD-21 as notified.
511.15	Todd Energy Limited	HAZS / Overview	Amend the HAZS Chapter overview as follows: ...as they relate to significant hazardous facilities. <u>Offsite risks that significant hazardous facilities may pose relate to very low probability, high potential impact emergency events. With respect to risks to surrounding land uses from significant hazardous facilities, these relate to emergency events that have</u>	Support in part	Support intent to amend the HAZS Chapter overview to clarify the approach to managing SHF's both where there is and where there isn't a mapped Risk Management Area. Any such amendments should, however, recognise that risk associated with SHFs may not necessarily just be measured in terms of individual fatality risk (e.g. waste water treatment plants, milk

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			<p>low probability of occurring but high potential harm to people and damage to property. The level of unacceptable risk ... is based on internationally accepted standards recognised and accepted evidence. For this plan, the risk <u>of a fatality</u> (probability of an event occurring – i.e. frequency x consequence) <u>is defined as a 1/1,000,000 (1 x 10⁻⁶ or read as one in a million) per year event.</u> of fatality to an individual person if they were to spend 365 days per year, 24 hours per day at that location, is the level of unacceptable risk for residential use from these events.</p> <p><u>This is based on adjacent land use being residential, where it is assumed the area is occupied 24 hours per day, 365 days per year. This one in a million per year event is defined as the level of unacceptable risk that is shown by Risk Management Contours.</u></p> <p><u>For some significant hazardous facilities where offsites risks have been quantified sites, the Risk Management Contours are shown in the District Plan to manage the existing significant hazardous facility and sensitive activities near these facilities. risks and reverse sensitivity effects.</u></p> <p>For other significant hazardous facility sites where Risk Management Contours are not in the District Plan, Council uses a non- District Plan layer to identify <u>an arbitrary the location of significant hazardous</u></p>		<p>processing plants etc) and or acceptability limited to the one in a million individual fatality contour.</p> <p>The Oil Companies also note that any update of the arbitrary 250m buffer to include an updated risk profile setback for a site would need to be accompanied by a rigorous peer review process.</p>

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			<p>facilities, from which a 250m separation distance applies.</p> <p>Where no Risk Management Contour is mapped in the District Plan for a significant hazardous facility, proposed works to this facility and/or sensitive activities seeking to locate in proximity to this facility will require a site specific technical report prepared by a suitably qualified and experienced person to be provided to the Council, to <u>establish quantify</u> the extent of the risk area. <u>The non-District Plan layer can be updated to remove the arbitrary 250m buffer and include the updated risk profile setback for that site."</u></p>		
543.10c	Taranaki Energy Watch Incorporated	HAZS / Policies	<p>Amend the HAZS Policies to ensure the issues identified in Part 2: Part 2: District-Wide Matters/HAZS-Hazardous Substances identified by Council in the Hazardous Substances Decision Report; the interim findings of the Environment Court for risk of fire and explosion specifically relating to petroleum exploration and petroleum production activities; and ensure consistency with the South Taranaki District Plan. Currently missing a provision for new significant hazardous facility to require a quantitative risk assessment. This is a key mechanism in determining the unacceptable level of risk of 1×10^{-6} for land use planning for new significant hazardous facilities.</p>	Support in part	<p>Support the intent of the submission to ensure consistency with the approach to managing hazardous substances set out in the South Taranaki District Plan and the decisions of the associated TEW Environment Court case. The Oil Companies are not necessarily opposed to a requirement for quantitative risk assessment of new significant hazardous facilities where this is warranted due to the nature, scale and context of the specific proposal. However, a requirement to provide Quantitative Risk Assessment (QRA) for all new SHF's is opposed as QRA may not be necessary or appropriate in all situations, for example where risk is not measured in terms of individual fatality risk (e.g. freezing works, wastewater treatment plants, milk processing plants) and/or where other methods of risk assessment may be more appropriate to a specific SHF, such as qualitative assessment, societal risk assessment or the BowTie approach.</p>

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565.88	Transpower New Zealand Limited	HAZS / Policies / New policy	<p>Add the following new policy to the Hazardous Substances chapter:</p> <p><u>HAZS-P10</u> <u>Avoid locating significant hazardous facilities within the National Grid Yard and National Grid Substation Corridor to ensure that operation, maintenance, upgrading, and development of the electricity transmission network is not compromised.</u></p>	Oppose in part	<p>The Oil Companies acknowledge the need to avoid conflict between the National Grid and the storage of certain hazardous substances (i.e. those with flammable properties). However, in the context that there are existing National Grid lines traversing the Omata Tank Farm, they do not support the approach set out in the wording of the proposed new policy. This existing situation needs to be recognised and any such new policy worded in a way that focuses on the specific issue i.e. the storage of hazardous substances with flammable properties in close proximity to the National Grid, not the presence of a SHF per se. In the case of the Omata Tank Farm, for example, these facilities occupy large sites incorporating landscaped areas, stormwater management areas and activities not specifically involving hazardous substances storage (e.g. office buildings, parking & manoeuvring spaces), where there may be no specific conflict with National Grid lines, or other provisions (e.g. building setbacks from National Grid lines) already apply. Any such new policy could be more appropriately worded along the following lines:</p> <p><i>HAZS-P10</i> <i>Avoid the storage of hazardous substances with flammable properties at significant hazardous facilities within the National Grid Yard and National Grid Substation Corridor to ensure that operation, maintenance, upgrading, and development of the electricity transmission network is not compromised.</i></p>

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565.84	Transpower New Zealand Limited	HAZS / Rules / HAZS-R9	<p>Amend Rule HAZS-R9 as follows: HAZS-R9 Significant hazardous facilities within the National Grid Yard <u>or National Grid Substation Corridor</u> <u>All zones Activity status: NC</u> <u>If a resource consent application is made under this rule, Transpower will be considered an affected person in accordance with Section 95E of the Act and notified of the application, where written approval is not provided.</u></p> <p><u>Activity status where compliance not achieved: N/A</u></p>	Oppose	<p>The Oil Companies oppose a non-complying activity status for SHF in the National Grid Yard or National Grid Substation Corridor. As per the Oil Companies further submission to 565.88, any restriction on SHF's should focus on the storage of hazardous substances with flammable properties in the National Grid Yard or National Grid Substation Corridor, not the presence of a SHF per se. In the case of the Omata Tank Farm, for example, where there are existing National Grid lines, the SHF facilities occupy large sites incorporating landscaped areas, stormwater management areas and activities not specifically involving hazardous substances storage (e.g. office buildings, parking & manoeuvring spaces), where there may be no specific conflict with National Grid lines, or other provisions (e.g. building setbacks from National Grid lines) already apply. A non-complying activity status for SHF as a whole would result in inappropriate restrictions on minor works with no effect on the integrity of the National Grid.</p> <p>Further, the Oil Companies oppose a mandatory requirement for notification of Transpower and consider the ordinary tests of Section 95E of the Act should prevail.</p> <p>The Oil Companies oppose the submission in its entirety and seek that it be disallowed.</p>
570.14	LPG Association of New Zealand	HAZS / Rules / HAZS-R10	<p>Seeks interim relief: Provide a definition of Public Access Corridor. Submitter holds position to oppose this rule depending on definition of Public Access Corridor and/or confirmation of rule intent through hearing process.</p>	Support	<p>Allow the submission and clarify what is meant by the term Public Access Corridor. It is the Oil Companies' understanding (refer Public Access chapter) that the term Public Access Corridors relates to dedicated pedestrians and / or cycle accessways only and not to roads. However, clarification is</p>

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					required. A requirement under HAZS-R10 for SHFs to be set back 50m from roads would be unrealistic and opposed.
522.72	Heritage New Zealand Pouhere Taonga	SASM / Policies / New policy	1. Add a new policy specifically to avoid the destruction or demolition of sites and areas of significance to Māori. 2. Add an associated rule with non-complying activity status.	Oppose	The Oil Companies support the intent to provide clearer policy guidance around avoiding the destruction or demolition of sites and areas of significance to Māori, and consider this is achieved through the changes sought in their own submission (ref 551.112) to Policy SASM P2. The Oil Companies do not, however, support inclusion of a new rule with non-complying activity status and consider discretionary activity Rule SASM R8 already enables appropriate consideration of the effects of earthworks on such sites.
522.70	Heritage New Zealand Pouhere Taonga	SASM / Rules / New rule	Insert a new rule in the SASM chapter that provides for the demolition or destruction of scheduled archaeological sites as a non-complying activity.	Oppose	
522.90	Heritage New Zealand Pouhere Taonga	SASM / Rules / New rule	Add a new rule to the SASM chapter that provides for the demolition or destruction of sites or areas of significance to Māori as a non-complying activity.	Oppose	
472.1	Dow AgroSciences (NZ) Limited	SASM / Rules	Amend the rules in the SASM chapter, and SASM-R4 in particular to provide for permitted activity status for minor repairs and maintenance within sites of significance to Māori, so that it can continue to carry out its functions safely without resource consent.	Support	The Oil Companies support the relief sought as a practical approach to enabling ongoing maintenance and operation of facilities containing identified SASMs. Allow the submission and make the changes sought.
309.15 & 309.16	First Gas Limited	EW / Rules / New rule	Add new Restricted Discretionary Earthworks rule as follows: <u>Any earthworks within the Gas Transmission Pipeline Corridor which does not comply with the Permitted Activity standards / exceeds a depth of 400mm.</u> <u>Matter of discretion to include the following:</u> <u>a. The risk of hazards affecting public or individual</u>	Oppose	Disallow the submission and do not make the changes sought. The Oil Companies do not support the proposed new rule, noting that controls on earthworks within the Gas Transmission Pipeline Corridor are already included in Chapter NU-Network Utilities R39. The proposed new rule would potentially introduce a resource consent trigger for earthworks required to undertake routine maintenance or upgrade to the Oil Companies' wharflines, but where there is either no physical effect or there is already adequate protection in place. The Oil Companies' wharflines extend

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			<p><u>safety, and the risk of property damage.</u></p> <p><u>b. Measures proposed to avoid or mitigate potential adverse effects on the gas transmission pipeline.</u></p> <p><u>c. Technical advice, including an assessment of the level of risk.</u></p> <p><u>d. The outcome of any consultation with the owner and operator of the gas transmission pipeline.</u></p>		<p>between the port area and the Oil Companies' terminals, including at the Omata Tank Farm. The wharflines are located on the opposite side (eastern side) of Centennial Drive to the Gas Transmission Pipeline. However, parts of the mapped Gas Transmission Pipeline Corridor extend right over the road corridor and appear to cross over parts of the Oil Companies' wharflines. Earthworks in this location would not have a physical effect on the Gas Transmission Pipeline, but would potentially trigger a resource consent requirement under the proposed new rule, which would be unnecessary and unjustified. Further, the wharflines and the Gas Transmission Pipeline cross one another within the Omata Tank Farm. This situation is managed by the parties and further highlighted by existing rule NU-R39. The introduction of a new consent requirement for earthworks in this location is not supported. Further, it is anticipated that for works in the road corridor, the 'Before U Dig' and Road Opening Notice process should provide adequate protection to the Gas Transmission Pipeline, while for works on private land, works will need to be in accordance with the relevant pipeline easements.</p>
548.45	Greymouth Petroleum Limited	NU / Policies / NU-P7	<p>Amend Policy NU-P7 as follows: Require new sensitive activities, earthworks and buildings to be appropriately located and set back from <u>liquid petroleum or gas transmission pipelines</u> to: ...</p>	Support	<p>The Oil Companies support amending Policy NU-P7 to apply to liquid petroleum pipelines as well as gas transmission pipelines. Allow the submission and make the changes sought.</p>
309.11	First Gas Limited	NU / Rules / NU-R39	<p>Amend Rule NU-R39 as follows: 3. ...prior to the commencement of the works; 4. <u>Earthworks and land disturbance within the land transport corridor must not be within 3 metres of a gas transmission pipeline, except where undertaken in</u></p>	Oppose	<p>The Oil Companies oppose the changes sought and seek that Rule NU-R39 be retained as notified. The Oil Companies note that a new definition of 'Gas Transmission Pipeline Risk Assessment' is also sought by the submitter. The level of information required is not considered warranted in all the</p>

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			<p><u>accordance with a Gas Transmission Pipeline Risk Assessment; or</u> <u>5. Earthworks and land disturbance outside the land transport corridor must not be within 20 metres of a gas transmission pipeline, except where undertaken in accordance with a Gas Transmission Pipeline Risk Assessment.</u></p> <p>Note: 1. Clauses (2) to (5) above do not apply to land disturbance undertaken as part of normal agricultural, horticultural or domestic cultivation activities, or the maintenance and repair, including sealing, of a road, footpath, driveway or farm track. 2. Clause (2) does not apply to earthworks or land disturbance undertaken by a network utility operator within a road reserve...</p>		<p>circumstances proposed by the changes to Rule NU-R39. As noted in the Oil Companies further submission to 309.16, the Oil Companies' wharflines are located on the opposite side of Centennial Drive to the Gas Transmission Pipeline. A requirement to undertake a 'Gas Transmission Pipeline Risk Assessment' within 20m of a gas transmission pipeline would, therefore affect the Oil Companies' wharflines, notwithstanding that any works to those wharflines would be separated by the width of the road and the need to remain clear of the transport corridor and would have no material effect on a gas transmission pipeline.</p>
309.13	First Gas Limited	NU / Rules / NU-R41	<p>Amend Rule NU-R41 as follows: <u>Restricted Discretionary Activities</u></p> <p><u>Gas Transmission Sensitive Activities within 60 metres of the Gas Transmission Pipeline Network.</u></p> <p><u>Matters of discretion are restricted to:</u></p> <p><u>Where:</u> 1. <u>The gas transmission sensitive activity does not involve the use, storage or disposal of hazardous substances with explosive or flammable intrinsic properties, except when the use, storage or disposal</u></p>	Oppose	<p>The submission is opposed to the extent the new rule sought would apply to hazardous facilities, by virtue of submission 309.6 from the submitter, which seeks a new definition of 'gas transmission sensitive activities', that includes hazardous facilities. The Gas Transmission Pipeline traverses the Omata Tank Farm, which is an existing significant hazardous facility. A rule that seeks to require a separation distance of 60m between the Gas Transmission Pipeline where it traverses the Omata Tank Farm is considered unworkable, potentially unnecessary based on the understanding the Gas Transmission Pipeline is underground, and is opposed. The submission should be disallowed.</p>

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			<p><u>of such substances is ancillary to gas transmission activities or in domestic scale quantities.</u></p> <p><u>Matters of discretion are restricted to:</u></p> <p><u>a. The extent to which the proposed activities are likely to compromise the stability or integrity of the gas transmission pipeline and the operation, maintenance and upgrading of the pipeline.</u></p> <p><u>b. The risk of hazards affecting public or individual safety, and the risk of property damage.</u></p> <p><u>c. Measures proposed to avoid or mitigate potential adverse effects on the gas transmission pipeline.</u></p> <p><u>d. An assessment of any risks to the environment that are likely to arise from the activity being located in proximity to the gas transmission pipeline.</u></p> <p><u>e. The outcome of any consultation with the owner and operator of the gas transmission pipeline.</u></p> <p><u>f. The extent to which vehicular, physical and legal access to the gas transmission pipeline is maintained</u></p> <p><u>g. Whether any possible alternative locations or methods for undertaking the activity exist.</u></p>		
309.3	First Gas Limited	Definitions / New definition / GAS TRANSMISSION PIPELINE CORRIDOR	Add a new definition for gas transmission pipeline corridor as follows: <u>The area of land within 10m from the centreline of the Gas Transmission Pipeline.</u>	Support in part	The intent to clarify the extent of the Gas Transmission Pipeline Corridor is supported.
309.5	First Gas Limited	Definitions / New definition / GAS TRANSMISSION PIPELINE RISK ASSESSMENT	Add a new definition for gas transmission pipeline risk assessment as follows: <u>Means an assessment prepared by a suitably qualified</u>	Oppose	The submission point is opposed to the extent that the submission as a whole would result in a requirement for such an assessment to be undertaken when works are proposed to the existing SHFs at the Omata Tank Farm and potentially the

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			<p><u>person nominated by the owner of the gas transmission pipeline on behalf of a Network Utility Operator, which as a minimum:</u></p> <p><u>a. establishes the minimum separation distances for the safety as between the Network Utility Operator's Utility Structures and the gas transmission pipeline;</u></p> <p><u>b. determines other minimum separation requirements such as for operation, maintenance and repair of the Utility Structure, the gas transmission pipeline and any other Utility Structures in the road and motorway corridors;</u></p> <p><u>c. demonstrates compliance with applicable legislation, standards and codes of practice which provide minimum depths and separation distances for Utility Structures;</u></p> <p><u>d. summarises the outcome of consultation with the gas transmission owner and operator; and</u></p> <p><u>e. discuss risk issues with the Transport Corridor Manager and ensure these are managed appropriately in the design.</u></p>		<p>Oil Companies' wharflines in Centennial Drive. The requirements of the proposed transmission pipeline risk assessment are unduly onerous where there is an existing relationship between these facilities.</p>
309.6	First Gas Limited	Definitions / New definition / GAS TRANSMISSION SENSITIVE ACTIVITY	<p>Add a new definition for gas transmission sensitive activity as follows:</p> <p><u>Gas Transmission Sensitive Activity</u> <u>Means those activities that are particularly sensitive to the Gas Transmission Network, including but not limited to:</u></p> <ul style="list-style-type: none"> <u>• medium and high-density residential activities;</u> <u>• retirement villages;</u> 	Oppose	<p>The inclusion of 'hazardous facilities and infrastructure (excluding those that are ancillary to gas transmission)' in the proposed definition of 'gas transmission sensitive activity' is opposed, particularly in the context that other parts of the submission (ref 309.13) seek to require a 60m setback for gas transmission sensitive activities from the Gas Transmission Pipeline. The Gas Transmission Pipeline traverses the Omata Tank Farm, which is an existing significant hazardous facility. Further, the term 'hazardous facilities and infrastructure' is not</p>

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			<ul style="list-style-type: none"> • <u>hospitals and healthcare facilities;</u> • <u>educational facilities;</u> • <u>community facilities, including museums, stadiums and halls;</u> • <u>leisure and entertainment facilities, including shopping malls and movie theatres;</u> • <u>marae;</u> • <u>custodial corrections activities;</u> • <u>entertainment facilities;</u> • <u>visitor accommodation;</u> • <u>hazardous facilities and infrastructure (excluding those that are ancillary to gas transmission); and</u> • <u>other venues or areas where larger numbers of people are intermittent and in larger numbers than the general location/area.</u> 		otherwise defined in the plan and could be interpreted as including facilities such as the Oil Companies' wharflines or service station and truck stop sites, and potentially all types of 'infrastructure'. While the intent to maintain appropriate separation distances between potentially incompatible activities can be supported in principal, the proposal to require a 60m setback for hazardous facilities and infrastructure is impractical and is opposed. The submission should be disallowed.
309.7	First Gas Limited	Definitions / New definition / REGIONALLY SIGNIFICANT INFRASTRUCTURE	<p>Add a new definition for regionally significant infrastructure as follows:</p> <p><u>means regionally significant infrastructure including:</u></p> <p><u>a. The Gas Transmission Network;</u></p> <p>...</p>	Support in part	The Oil Companies support the intent to recognise infrastructure of regional significance and consider any such definition should include the bulk fuel storage terminals. It is noted the Taranaki RPS (at section 15.2) identifies such infrastructure as regionally significant.
549.1	Taranaki Regional Council	TRAN / Policies / New policy	Add a new policy to The Transport Chapter that provides or plans for appropriate access to and from Port Taranaki, and cross-reference this to the Port Zone Chapter.	Support	The Oil Companies support the submission and seek that it be allowed. The Oil Companies agree that the role of Port Taranaki in regional and national transport infrastructure should be recognised.
566.53	Waka Kotahi New Zealand Transport Agency	NH / Policies / New policy	<p>Add the following new policy to the Natural Hazards chapter:</p> <p><u>"Allow for the operation, maintenance, upgrading and construction of infrastructure, in areas subject to natural hazards when:</u></p>	Support	The Oil Companies support the submission and seek that it be allowed.

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			<u>(a) infrastructure is functionally or operationally required to locate in hazard areas or it is not reasonably practicable that it be located elsewhere;</u> <u>(b) in coastal hazard areas the infrastructure does not significantly increase risk to people, property and the environment, and where risks cannot be avoided, adverse effects are mitigated; and</u> <u>(c) in all flood hazard areas risks to people, property and the environment are mitigated to the extent practicable."</u>		
459.350 a	Te Kotahitanga o Te Atiawa Trust	MFZ	Amend the PREC4 - Figure 91 - Methanex Motunui Precinct, PREC5 - Figure 92 - Methanex Waitara Valley Precinct, PREC6 - Figure 93 - McKee Mangahewa Production Station Precinct, PREC7 - Figure 94 - Pohokura Production Station Precinct, PREC8 - Figure 95 - Omata Tank Farm Precinct and PREC9 - Figure 96 - Paritutu Tank Farm Precinct and make consequential changes to the provisions of the Major Facility Zone alongside mana whenua through a cultural impact process.	Oppose	The submission is opposed on the basis that the specific relief sought is uncertain.
503.19	Ngāti Rāhiri Hapū o Te Atiawa (Taranaki) Society Inc	MFZ	Seek confirmation and guarantee from Council that SASM in these zones will be protected, and that the activities in these zones (especially noise, light and smell effects) do not affect traditional reserved lands that are immediately adjacent to the zones. If this guarantee cannot be given then Submitter opposes the rezoning of these areas.	Oppose	Support the intent to ensure clarity in the interface between the MFZ and SASM, but oppose on the basis that the specific relief sought is uncertain.
466.19	Omata Tank Farm Operators	MFZ / PREC8 - Figure 95 - Omata Tank Farm Precinct	1. Amend PREC8 - Figure 95 Omata Tank Farm Precinct to include a road and coastal environment setback for the precinct, and that the setback is "no minimum	Support	Support removing the minimum setback requirement for the precinct, noting that similar relief is sought by way of the Oil

Sub No	Submitter	Proposed Plan Provision	Decision Request	Position of further submitter	Reason for Oil Companies' Further Submission and Relief Sought
			setback". 2. Amend "Lattice Energy" to "Beach Energy".		Companies' own submission 551.182a. The submission should be allowed.
582.45	New Plymouth District Council	CE / Objectives / New objective	Add a new objective to recognise activities within the coastal environment that are important to the social, economic and cultural well-being of people and communities and provide for appropriate, subdivision, use, development and occupation of the coastal environment. Consequential amendment to Policy CE-P7 to allow consideration of the positive effects associated with an activity.	Support	Support proposed new objective and agree it is important to recognise activities within the coastal environment that are important to the social, economic and cultural well-being of people and communities. The submission should be allowed.
487.2a	The Royal Forest and Bird Protection Society of New Zealand Incorporated	CE	Add new policy and rules to give effect to Policies 11, 13 and 15 of the NZCPS, and to ensure they apply to the full Coastal Environment overlay. Clarify the relationship between the Coastal Environment chapter to other chapters. Identify areas of high natural character areas and show these on the planning map overlays, and include policy and rules to avoid, remedy or mitigate effects on high natural character areas.	Oppose	The Oil Companies support the intent of ensuring appropriate effect is given to the NZCPS. Any such new provisions would need to appropriately balance with Policies 6 and 9 of the NZCPS relating to activities and Ports in the coastal environment. The submissions are opposed to the extent the specific relief sought is uncertain.
487.87	The Royal Forest and Bird Protection Society of New Zealand Incorporated	CE / Policies / New policy	Add policies to give effect to Policy 11 and 15 of the NZCPS into the Coastal Environment overlay chapter.	Oppose	
459.337	Te Kotahitanga	PORTZ	Amend PREC10 – Figure 101 - Port Precinct Map - Port Areas and Height Limits and make consequential	Oppose	The submission is opposed on the basis that the specific relief sought is uncertain.

Sub No	Submitter	Proposed Plan Provision	Decision Request	Position of further submitter	Reason for Oil Companies' Further Submission and Relief Sought
	o Te Atiawa Trust		changes to the provisions of the Port Zone alongside mana whenua through a cultural impact process.		
536.1	Seaport Land Company Limited	PORTZ	<p>1. Review the Port Zone policies, rules and objectives and consult with Ngāti Te Whiti, land owners, other interested parties within the Port and the wider community with a mind to developing a detailed, ambitious structure plan for the Port Zone that will replace the Port Precinct Plan - Figure 101. Port zones are able to be vibrant, beneficial places for everyone. The Port is part of our community, and our community should be involved in shaping it.</p> <p>Or,</p> <p>2. If the NPDC is unable or unwilling to do this, at a minimum seeks the following relief;</p> <ul style="list-style-type: none"> • A 7th area within the Port Zone be added to cover the Coolstores Site, and appropriate rules and descriptions developed to cover this area. 	Oppose in part	The Oil Companies have infrastructure, including wharflines and terminal facilities, in the Port Zone and, as such, have an interest in any structure plan that may be developed for the Port Zone in place of the current Port Precinct Plan.