

**BEFORE THE NAPIER CITY PROPOSED DISTRICT PLAN
HEARINGS PANEL**

In the matter of

the Resource Management Act 1991

and

**The hearing of submissions and further
submissions made on the Napier City
Proposed District Plan – Hearing Stream 2 –**

- **Subdivision**
- **Coastal Environment**
- **Earthworks**
- **Natural Features and Landscapes**

**Statement of evidence of Sarah Silk for Transpower New
Zealand Limited (Submitter 99 and Further Submitter
FS415)**

Dated 18 November 2024

1. **Executive Summary**

- 1.1 Transpower New Zealand Limited (“Transpower”) owns and operates the National Grid, which transmits electricity throughout New Zealand from energy generation sources to distribution networks and large direct-connect customers. Transpower has existing assets within the Napier District, comprising two transmission lines and one substation.
- 1.2 While a resilient National Grid remains at the heart of New Zealand’s energy future, climate change has become a central issue for governments globally and hence for Transpower as a responsible owner and operator of the National Grid on behalf of New Zealanders. In this role, Transpower will play a critical role for New Zealand in meeting its zero carbon aspirations, by both investing in its existing National Grid assets and enabling connections to new sources of renewable energy.
- 1.3 Transpower’s submission seeks that appropriate planning provisions are included in the Napier City Proposed District Plan (“PDP”) to ensure that Transpower is able to develop, upgrade, operate and maintain the National Grid to enable a sustainable, secure and reliable supply of electricity to the Napier District and beyond.
- 1.4 **Ms Whitney’s** evidence addresses recommendations in the s42a reports for Hearing 2. With regard to the s42a report recommendations on the subdivision provisions, the main recommendation in contention relates to the activity status for the National Grid Subdivision Corridor rule and assessment matters within Assessment Criteria SUB-AC9. Ms Whitney’s evidence recommends that amendments to the PDP are necessary to achieve consistency with and give effect to higher order provisions. I concur with the alternative approaches recommended in **Ms Whitney’s** evidence.

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2. **Qualifications and Experience**

2.1 My full name is Sarah Kay Silk.

2.2 I am employed by Transpower New Zealand Limited ('Transpower') as the Environmental Projects Team Leader (part of the Environment Group). My relevant experience, qualifications, and commitment to comply with the code of conduct for expert witnesses are included in **Appendix A**.

2.3 I confirm that I am authorised to give this evidence on behalf of Transpower.

3. **Scope of Evidence**

3.1 My evidence will address the following:

- a) Transpower and the National Grid;
- b) Transpower's assets and projects within the Napier District;
- c) The National Grid's role in Aotearoa New Zealand's energy future;
- d) Regulating subdivision within the vicinity of the National Grid and
- e) Conclusions.

3.2 The focus of my evidence for this hearing is to provide contextual information on Transpower and the role and importance of the National Grid. I also provide some information on Transpower's approach to managing subdivision in the National Grid Subdivision Corridor. Further Transpower company evidence of a more specific nature regarding the National Grid corridors is expected to follow at Hearing 3.

4. **Transpower and the National Grid**

4.1 Transpower is a State-Owned Enterprise that plans, builds, maintains, owns, and operates New Zealand's high voltage electricity transmission network – the National Grid. The National Grid links generators to distribution companies and major industrial users. It extends from Kaikohe in the North Island to Tiwai in the South Island and carries electricity throughout New Zealand.

4.2 New Zealand has become increasingly dependent on electricity. It is an intrinsic part of living and working in the 21st century. Electricity now accounts for approximately 26% of all energy used in New Zealand.¹ Each year, \$6 billion worth of electricity is traded on the wholesale electricity market.² Transpower, whose

¹ [Energy statistics | Ministry of Business, Innovation & Employment \(mbie.govt.nz\)](https://www.mbie.govt.nz/energy-statistics)

² [Clearing manager | Electricity Authority](https://www.electricityauthority.govt.nz/clearing-manager)

main role is to ensure the delivery of a reliable and secure supply of electricity to New Zealand, has a fundamental role in the industry and in New Zealand's economy.

- 4.3 Transpower is not a generator of electricity and has no retail sales of electricity. It can be considered a 'freight company' for electricity, in that it carries bulk electrical energy from where it is generated by companies such as Contact Energy, Meridian and Genesis to the local lines distribution companies (e.g. Unison for Napier) and some major users of electricity (e.g. Tiwai Point Aluminium Smelter and NZ Steel at Glenbrook).
- 4.4 Transpower also manages New Zealand's power system in real time. This role is known as the 'System Operator', and it's one carried out by Transpower under contract to the Electricity Authority³. As System Operator, Transpower operates the electricity market to ensure electricity transmitted through the National Grid is delivered whenever and wherever it is needed, 24 hours a day, seven days a week. This requires balancing electricity supply and demand in real time.
- 4.5 Transpower's main role is to ensure the reliable supply of electricity to the country. Transpower plays a significant part in New Zealand's economy, with all major industries, cities and communities being reliant on a secure and reliable supply of electricity. **Figure 1** is a schematic of the electricity industry in New Zealand, with the National Grid assets being represented as 'Transmission' and 'Substations'.

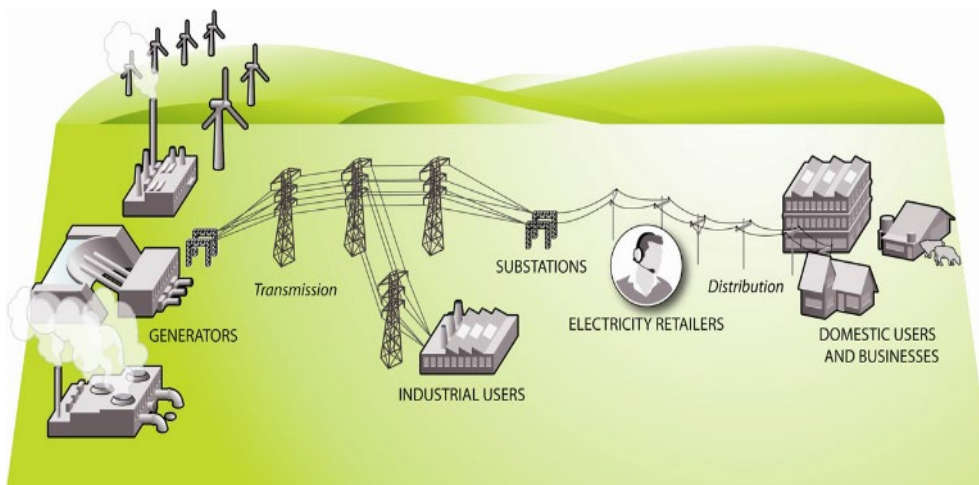


Figure 1. Electricity Industry in New Zealand (Source: MBIE).

³ The Electricity Authority is an independent Crown entity responsible for the governance and regulation of New Zealand's electricity industry.

- 4.6 As a State-Owned Enterprise, Transpower's principal objective is to operate as a successful business. It must operate within certain legislative constraints and report regularly to its shareholding Ministers (of which there are two: the Minister for State-Owned Enterprises and the Minister of Finance). Transpower is required to deliver and operate a National Grid that meets the needs of users now and into the future.
- 4.7 One of Transpower's key objectives therefore is to maintain and develop the National Grid, which contributes to New Zealand's economic and social aspirations. This is reflected in the single objective of the National Policy Statement on Electricity Transmission 2008 (NPSET), which is a national policy statement prepared under the Resource Management Act 1991 (RMA).
- 4.8 Prudent investment in the National Grid, long term transmission planning strategies, and developing technologies are crucial to ensure the most can be made from existing infrastructure. Proper maintenance and access to the National Grid is essential to defer the need for new lines and substations and to create better options for when new build is required. This will, in turn, help to limit the cost and environmental footprint of the National Grid for future generations. This is more critical than ever in the context of the Climate Change Response (Zero Carbon) Amendment Act 2019, which I expand on later in this evidence.

The National Grid Network

- 4.9 The National Grid comprises some 11,000 kilometres of transmission lines supported by towers and poles, and over 170 substations across the country. This is supported by a network of some 300 telecommunication sites, which help link together and communicate with the components that make up the National Grid.
- 4.10 The National Grid comprises a high voltage backbone which runs the length of the country and links major generation (such as the South Island hydro lakes and central North Island hydro and thermal generation sources) to major loads in New Zealand's main urban centres. The bulk of the National Grid backbone was built around 60 years ago and comprises most of the 220 kilovolt (kV) lines throughout New Zealand, along with the High Voltage Direct Current (HVDC) link which connects the North and South Islands.
- 4.11 The National Grid provides connectivity between all sources of generation and consumers. Without the National Grid, consumers across New Zealand would be dependent on locally generated electricity which would be more expensive and less reliable. As such, the National Grid plays a significant role in the sustainable

management of natural and physical resources (including the National Grid as a nationally significant physical resource).

5. Transpower's Assets and Projects within Napier City

National Grid Assets in Napier City

- 5.1 There are two National Grid transmission lines that traverse Napier City, and one substation within it. Full details of these assets are provided in **Appendix B** of my evidence. I have included a map showing National Grid substation and transmission lines in Napier City as **Appendix C** of my evidence.
- 5.2 The National Grid is an interlinked network. Electricity flows along transmission lines via lines supported by towers, poles or pi poles and can vary in any instant, depending on actual generation at power stations and the demand for electricity across New Zealand. In operating the electricity market as System Operator, Transpower uses real-time information about electricity use by consumers and electricity generation available from generators to balance electricity demand and supply, ensuring optimum performance of the network.
- 5.3 For Transpower's transmission planning purposes, Napier is located within the Hawke's Bay transmission system as set out geographically in **Figure 2**.

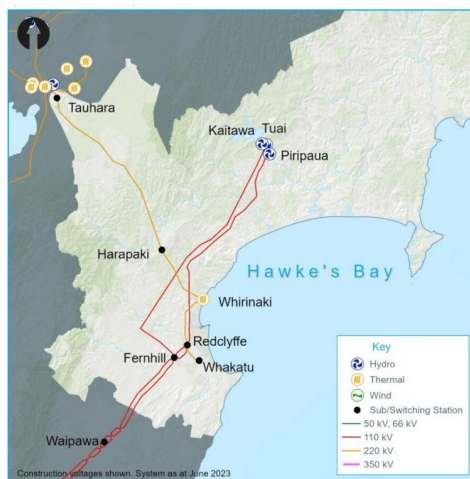


Figure 2: Hawke's Bay Region transmission (Source: Transpower Transmission Planning Report 2023)

- 5.4 The Hawke's Bay transmission system supplies a mix of significant provincial cities (Napier, Hastings and Gisborne), heavy industry (Pan Pac Mill), and smaller towns (Havelock North and Wairoa).

- 5.5 Transmission into the Hawke's Bay region is via two 220 kV circuits from Wairakei that directly supply the Whirinaki and Whakatu loads, and two 220/110 kV interconnecting transformers at Redclyffe. Two 110 kV circuits also connect the Hawke's Bay 110 kV system at Fernhill from Waipawa in the south.
- 5.6 Within the Hawke's Bay region, the transmission network comprises 220 kV and 110 kV transmission circuits. The majority of the region's load is supplied via the 220/110 kV interconnecting transformers at Redclyffe.
- 5.7 The Hawkes Bay regional peak demand is forecast to grow by an average 1.1 per cent per annum over the next 15 years, from 379 MW in 2023 to 445 MW by 2038. This is lower than the national average growth rate of 2.0 per cent per annum.
- 5.8 There are currently no "customer connection" projects within Napier City in our pipeline.
- 5.9 Transpower is carrying out business as usual maintenance and upgrade works on its assets within Napier City on both transmission lines and the substation. At Redclyffe substation these projects include the installation of a new transformer and associated oil containment tank within the 220kV switchyard, upgrades to the 110kV switchyard equipment and replacement of the existing crane hall building. Regular maintenance works will continue to occur on transmission lines such as pole replacements, vegetation maintenance, access track works, foundation strengthening and insulator replacements.
- 5.10 In February 2023, Cyclone Gabrielle caused major flooding and infrastructure damage in the region. The Redclyffe and Whirinaki substations were completely submerged, and the region underwent an emergency reconfiguration to restore supply. The Redclyffe substation was restored to its pre-cyclone configuration and capacity in mid-September 2023. An investigation into increasing resilience against flooding of substations in Hawke's Bay, particularly Redclyffe, is underway.

6. **The National Grid's Role in Aotearoa New Zealand's Energy Future**

Whakamana I Te Mauri Hiko – Empowering our Energy Future

- 6.1 In 2020, Transpower published a document "Whakamana i Te Mauri Hiko – Empowering our Energy Future". It sets out what the energy future in New Zealand may look like between now and the year 2050. This work, as well as other future

energy sector analysis,⁴ reflects a broad consensus of the key contribution of electricity to Aotearoa New Zealand’s future energy system that is consistent with a net zero carbon future. It shows that the greatest opportunities for emissions reductions outside of agriculture exist in the energy sector, specifically, around increasing the proportion of renewable electricity in the system and the electrification of transport and process heat.

6.2 Transpower’s base case scenario expects that electricity demand will increase 68% by 2050. To meet this increase in demand will require significant investment in New Zealand’s electricity generation, transmission and distribution infrastructure. Transpower’s role in New Zealand’s energy future is shown in **Figure 3**.

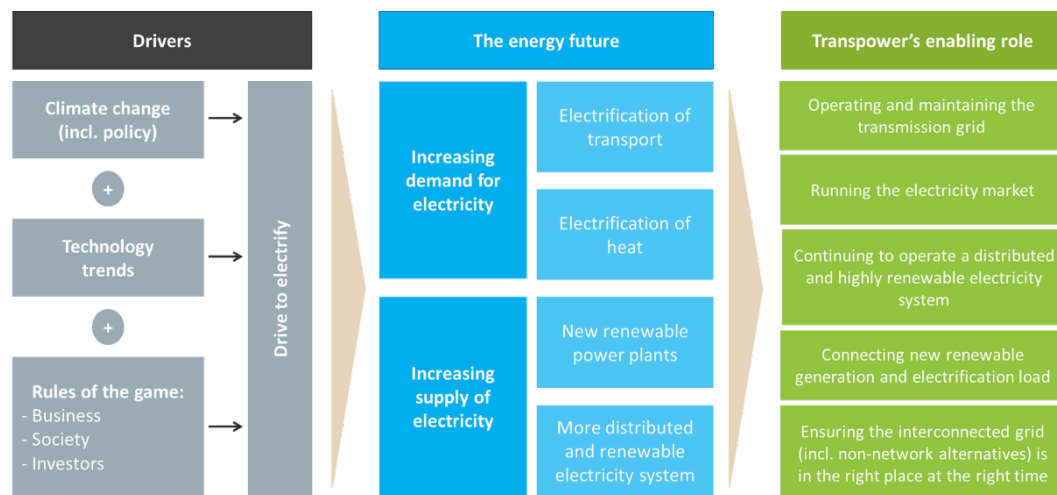


Figure 3: Transpower’s enabling role in support of goal to reach net-zero carbon by 2050

Transmission Tomorrow and Net Zero Grid Pathways

6.3 Transmission Tomorrow is Transpower’s strategy which outlines our choices and strategic priorities for how we plan to deliver across these energy futures and a sustainable, affordable, and reliable power supply to electricity consumers across Aotearoa New Zealand. An example of how Transpower prepare for the energy future is our Net Zero Grid Pathways (‘NZGP’) work programme – which contributes toward the energy future outlined in our Whakamana i Te Mauri Hiko publication. This specific programme of work aims to ensure New Zealand’s high voltage electricity infrastructure remains fit for purpose in line with the expectation of a

⁴ Boston Consulting Group (BCG) ‘Future is Electric’ report, Climate Change Commission (CCC) modelling (2021-2024) and MBIE Electricity Demand and Generation Scenarios (EDGS).

highly electrified economy. Transpower's current estimation is that around 70 new National Grid connections will be required in the next 15 years, with this trend continuing through to at least 2050.

- 6.4 Transpower's position is that there will be an enduring role for existing National Grid assets in the future, and the need to build new National Grid lines and substations to connect new, renewable generation sources to the electricity network wherever those generation sources are located. For example, if new renewable generation sources are constructed in the Napier District, new National Grid assets will most likely need to be authorised and constructed to connect the generation to the existing National Grid network.

Greenhouse gas emission reductions

- 6.5 Greenhouse gas emission reduction targets were agreed by New Zealand at the 2016 Paris Climate Accord and have been translated into domestic climate policy via the Climate Change Response (Zero Carbon) Amendment Act 2019. New Zealand's emission reduction targets include an international target and a domestic target. Our international target is the Paris Climate Accord. New Zealand has a target of 50% of net emissions below our gross 2005 level by 2030. This target can be met through both domestic action and offshore mitigation. The domestic net zero target outlines a domestic target to reduce emissions to net zero by 2050 (other than biogenic methane). In addition to these targets there will be five-yearly interim targets in the form of emissions budgets.
- 6.6 In August 2024, the Government announced its next steps on electrifying New Zealand under the Government's second emissions reductions plan. This plan includes Electrify NZ as a key pillar, within which the Government has committed to doubling renewable electricity generation and this will be a major contributor to achieving net zero carbon by 2050.⁵
- 6.7 To summarise the above, the National Grid:
- a) transports electricity across the country (connecting generation to consumers);
 - b) supports New Zealand's national and regional economic growth;
 - c) plays an essential role in maintaining reliability and security of supply of energy;

⁵ New Zealand's second emissions reduction plan, 2024, page 52.

- d) provides a basis for investment decisions to be made by both suppliers and consumers of electricity;
- e) enables competition among suppliers and retailers of electricity, thereby providing the basis for competitively priced electricity;
- f) assists the development of new electricity generation technologies, including renewable energy, by providing access to markets;
- g) enables the electrification of transport and process heat, without which there is no way in which New Zealand's Paris Agreement and net-zero carbon economy commitments can be met; and
- h) is predicted to play a key role in the decarbonisation of the economy.

7. **Subdivision**

7.1 Transpower's preferred approach to implement the NPSET in District Plans is to require land use setbacks (the 'National Grid Yard' and a subdivision corridor (the 'National Grid Subdivision Corridor') with associated rules. This approach implements the NPSET in District Plans and ensures the safe and sustainable management of the National Grid, third party activities and landowner and occupier usage near the assets. The provisions sought in Napier are generally consistent with operative provisions in other jurisdictions around the country. The National Grid Yard provisions will be heard at Hearing 3. I anticipate that evidence will be provided in relation to that hearing that will enable the Hearings Panel to gain a more fulsome understanding of the National Grid corridor approach, including examples of land use, subdivision and development that has the potential to compromise the National Grid. For the purpose of the submission points being considered at this hearing, I have addressed one component part of the National Grid corridor approach that Transpower seeks, which is the National Grid Subdivision Corridor.

7.2 Regulating subdivision within the vicinity of the National Grid will enable the Council to give effect to Policies 10 and 11 of the NPSET. Further, the Council will be able to manage the potential effects of a subdivision on the operation/maintenance and upgrading of the network as Transpower is not always recognised as being affected by subdivision applications.

7.3 In my view subdivision within the Napier District should be regulated near the transmission lines because:

- a) Transpower wants to avoid the creation of allotments on which it would be difficult or impossible to construct a complying dwelling;

- b) Subdivision is an opportunity to design around the transmission lines, so that subsequent development can occur safely and not compromise the National Grid;
- c) The public has an expectation that at least one dwelling can be constructed on each legal title. The requirement to demonstrate complying building platforms is consistent with this;
- d) Subdivision can disrupt access to lines because it often precedes changes to land uses, including fences and driveways (which can prevent or facilitate access to land). Transpower has the legal right under the Electricity Act 1992 to access the lines but the physical ability to access the lines also needs to be protected;
- e) Transpower cannot rely on NZECP34:2001 to protect the National Grid from the effects of subdivision, as it does not restrict the subdivision of land near lines or substations and it does not prevent underbuilding;
- f) Subdivision also means Transpower will in the future need to manage its operations around a greater number of landowners and their activities; and
- g) Transpower is not always recognised by councils or applicants as being affected by subdivision applications.

7.4 Subdivision provides the framework for future land use and is enduring. Integrated planning at the subdivision stage can avoid land use conflicts later. In particular, restricted discretionary activity status (defaulting to non-complying if certain requirements are not met) at the subdivision stage provides the opportunity for Transpower and the Council to consider whether buildings can be sited in a safe manner, and in a way that avoids transmission activities being compromised. It also avoids reverse sensitivity effects arising from the visual, noise and other impacts of the National Grid (consistent with Policy 10 of the NPSET). Attached as Appendix D is a table that sets out the activity status of operative National Grid corridor provisions in district plans throughout New Zealand. ⁶

7.5 The PDP needs to establish rules to avoid potential future adverse effects on National Grid infrastructure. Given the significance of the issues involved, and the directives of the NPSET, this is an appropriately proactive approach to pursue.

7.6 The following are some examples of successful subdivision outcomes near the National Grid, to demonstrate how the National Grid Subdivision Corridor provisions can be implemented in practice. This includes the provision of roads underneath the lines and lot configuration that provides fully complying and usable lots.

⁶ I note that the National Grid Yard rules listed in Appendix D are not the subject of this hearing, but the standards listed are consistent with Transpower's submission on the PDP and the approach in other jurisdictions.

7.7 Compatible development of greenfield sites is possible, especially if those plans take account of Transpower infrastructure. The subdivision in **Figure 4** in Queenstown is an example where Transpower has supported subdivision around the National Grid. The application was approved with “no build” consent notices imposed as conditions over some residential allotments within the corridor, which is shown running horizontally through the centre of the image. The “no build” areas are indicated by the diagonal striping over parts of some lots on the south side of the road. In consultation with Transpower, the developer designed the subdivision so that the transmission line corridor traversed primarily roads and reserves.



Figure 4: Subdivision at Lake Hayes, Queenstown

7.8 **Figure 5** is an aerial photo of this subdivision scheme plan, post-construction. It shows the road broadly following the alignment of the transmission line centreline, with dwellings set back.



Figure 5: Implemented subdivision at Lake Hayes, Queenstown

7.9 Another example of compatible greenfields subdivision development is the Industrial Highbrook Development in South Auckland (**Figures 6 and 7**) where the roads and industrial buildings were planned and constructed to minimise the impacts on Transpower’s infrastructure, and consequently the road users and owners/occupiers of the neighbouring land. As can be seen from the photos, the road has been designed around a clear yard and comparatively clear corridor.



Figure 6: Highbrook Development in South Auckland



Figure 7: Highbrook Development in South Auckland

8. Conclusions

- 8.1 There has never been a greater need for the operation, maintenance, upgrade and development of the National Grid to be adequately enabled under the RMA framework. The National Grid is critical to the social and economic wellbeing of the Napier District and our nation generally. It will also play a critical role in Aotearoa New Zealand's carbon zero commitment and mitigating the effects of climate change. This will necessitate the upgrade of existing, and construction of new, National Grid assets in the future. As an infrastructure asset of national significance, the NPSET requires that the National Grid be recognised, provided for and protected in the PDP.
- 8.2 Transpower's relief sought through the PDP hearing process will ensure integrated management of activities to provide for sustainable development of both the National Grid infrastructure and other natural and physical resources, both of which are critical for the future development of the Napier District and New Zealand. Transpower will provide further evidence on matters of detail to support its relief on the PDP in later hearing topics.

Sarah Silk

18 November 2024

Appendix A: Relevant Experience and Qualifications

1. I am the Environmental Projects Team Leader and part of Transpower's Environment Group, whose responsibilities include:
 - a) Strategic planning. This planning is achieved through the development and implementation of Transpower's corridor management programme at a national level and local level.
 - b) Delivering Transpower's strategic policy approach on environmental regulations, legislation and council planning documents.
 - c) Ensuring that all environmental approvals are obtained for Transpower's physical works, and internal staff, consultants and service providers are aware of, and able to comply with, their environmental obligations.
 - d) Internal/external stakeholder engagement with Councils, iwi, developers and customers.
2. I have been employed by Transpower for over 3 years, and during this time my responsibilities have included:
 - a) preparing environmental planning assessments, developing strategy and policies, and processes to deliver and monitor all the necessary environmental approvals for numerous major capex projects concerning both transmission lines and substations across the country.
 - b) working with customers to secure the necessary environmental approvals to enable new generation and local electricity distribution connections to the National Grid.
 - c) partnering and working with stakeholders, ensuring that key relationships are informed, risks are identified, and reputations are enhanced.
3. I have a Bachelor of Commerce and Administration in Public Policy and a Bachelor of Science in Environmental Studies from Victoria University. I have over 15 years' experience working in the private sector as well as central and regional government, this includes 9 years working in the Resource Management area.
4. Although this matter is not before the Environment Court, I acknowledge and confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. As I am employed by Transpower, I acknowledge I am not independent; however, I have sought to comply with the Code of Conduct. In particular, unless I state otherwise, this evidence is within my sphere of expertise, and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

Appendix B: National Grid Assets within Napier City

Transmission Lines:

The following National Grid transmission line assets are within Napier City:

- Redclyffe – Tuai A (RDF-TUI-A) 110 kV transmission line; and
- Redclyffe – Whirinaki (RDF-WHI-A) 220 kV transmission line.

Substations:

There is one National Grid substations within Napier City:

- Redclyffe Substation.

Appendix C: Map of National Grid assets in the Napier District



Appendix D: District Plans with Operative National Grid Corridor Provisions

Key	Description	Number	%
	Councils with operative National Grid corridor provisions in their District Plans	45	70%
	Councils that have commenced a process* to give effect to Policies 10 and 11 in their District Plans.	17	27%
	Councils that have not commenced any process to give effect to Policies 10 and 11 in their District Plans	2	3%
Total		64	100%

^Ω This symbol indicates district plans for which there are operative National Grid corridor provisions that have been or are currently being revisited as part of a second generation plan review. These councils include Waimakariri, Grey (via Te Tai o Poutini West Coast Combined District Plan), Porirua City, Napier City and Far North District.

District / Unitary Plan	Year operative	Sensitive activities, buildings or structures in the National Grid Yard		Earthworks in the National Grid Yard		Subdivision in National Grid Subdivision Corridor		
		Rules in Plan	Activity status	Rules in Plan	Activity status (standard/s not achieved)	Rules in Plan	Activity status (standards achieved)	Activity status (standard/s not achieved)
Operative National Grid Corridors								
Waimakariri District ^Ω	2008	✓	Discretionary	✓	Restricted discretionary	✓	Restricted discretionary	-
Stratford District	2009	✗	Discretionary	✗	-	✗	-	-
Kawerau District	2011	✓	Restricted discretionary and non-complying)	✓	Restricted discretionary	✓	Restricted discretionary	-
Upper Hutt City	2012	✓	Restricted discretionary	✗	-	✓	Restricted discretionary	-

District / Unitary Plan	Year operative	Sensitive activities, buildings or structures in the National Grid Yard		Earthworks in the National Grid Yard		Subdivision in National Grid Subdivision Corridor		
		Rules in Plan	Activity status	Rules in Plan	Activity status (standard/s not achieved)	Rules in Plan	Activity status (standards achieved)	Activity status (standard/s not achieved)
			and non-complying					
Ōtorohanga District	2012	✓	Discretionary	✓	Discretionary	✓	Permitted	Discretionary
Ashburton District	2012	✓	Non-complying	✗	-	✓	Controlled, restricted discretionary and discretionary	Non-complying
Tauranga City	2012	✓	Restricted discretionary, discretionary and non-complying	✓	Discretionary	✓	Restricted discretionary	-
Western Bay of Plenty District	2013	✓	Non-complying	✓	Non-complying	✓	Controlled, restricted discretionary and discretionary	Non-complying
Central Otago District	2013	✓	Non-complying	✓	Restricted discretionary	✓	Restricted discretionary	-
Waimate District	2013	✓	Non-complying	✗	-	✓	Restricted discretionary	Non-complying
Horowhenua District	2013	✓	Non-complying	✓	Non-complying	✗	-	-

District / Unitary Plan	Year operative	Sensitive activities, buildings or structures in the National Grid Yard		Earthworks in the National Grid Yard		Subdivision in National Grid Subdivision Corridor		
		Rules in Plan	Activity status	Rules in Plan	Activity status (standard/s not achieved)	Rules in Plan	Activity status (standards achieved)	Activity status (standard/s not achieved)
Rangitikei District	2013	✓	Discretionary	✓	Discretionary	✓	Restricted discretionary	Discretionary
Ruapehu District	2013	✓	Restricted discretionary, discretionary and non-complying	✓	Restricted discretionary	✓	Restricted discretionary	-
Whangārei District	2014	✓	Non-complying	✓	Non-complying	✓	Restricted discretionary	Non-complying
Hauraki District	2014	✓	Non-complying	✓	Restricted discretionary	✓	Restricted discretionary	-
Matamata-Piako District	2014	✓	Non-complying	✓	Restricted discretionary and non-complying	✓	Restricted discretionary	Non-complying
South Waikato District	2015	✓	Non-complying	✓	Non-complying	✓	Restricted discretionary	Non-complying
Rotorua District	2015	✓	Non-complying	✓	Non-complying	✓	Restricted discretionary	Non-complying
Waipa District	2015	✓	Non-complying	✓	Non-complying	✓	Restricted discretionary	Non-complying
Grey District ^Ω	2015	✓	Non-complying	✓	Discretionary and non-complying	✓	Controlled	Non-complying

District / Unitary Plan	Year operative	Sensitive activities, buildings or structures in the National Grid Yard		Earthworks in the National Grid Yard		Subdivision in National Grid Subdivision Corridor		
		Rules in Plan	Activity status	Rules in Plan	Activity status (standard/s not achieved)	Rules in Plan	Activity status (standards achieved)	Activity status (standard/s not achieved)
Clutha District	2015	✓	Non-complying	✓	Restricted discretionary and non-complying	✓	Restricted discretionary	-
Southland District	2015	✓	Non-complying	✓	Non-complying	✓	Discretionary	Non-complying
Hastings District	2016	✓	Non-complying	✓	Non-complying	✓	Controlled	Restricted discretionary
Porirua City ^Ω	2016	✓	Restricted discretionary and non-complying	✓	Restricted discretionary and non-complying	✓	Restricted discretionary	Non-complying
Hutt City	2016	✓	Non-complying	✘	-	✓	Restricted discretionary	Non-complying
Napier City ^Ω	2016	✓	Non-complying	✓	Non-complying	✓	Restricted discretionary	Non-complying
Far North District ^Ω	2017	✓	Non-complying	✓	Non-complying	✓	Controlled	Non-complying
Kaipara District	2017	✓	Non-complying	✓	Restricted discretionary	✓	Restricted discretionary	Discretionary
Thames-Coromandel District	2017	✓	Non-complying	✓	Restricted discretionary and non-complying	✓	Restricted discretionary	Non-complying

District / Unitary Plan	Year operative	Sensitive activities, buildings or structures in the National Grid Yard		Earthworks in the National Grid Yard		Subdivision in National Grid Subdivision Corridor		
		Rules in Plan	Activity status	Rules in Plan	Activity status (standard/s not achieved)	Rules in Plan	Activity status (standards achieved)	Activity status (standard/s not achieved)
Auckland	2017	✓	Non-complying	✓	Restricted discretionary and non-complying	✓	Restricted discretionary	Non-complying
Hamilton City	2017	✓	Non-complying	✓	Non-complying	✓	Restricted discretionary	Non-complying
Whakatāne District	2017	✓	Non-complying	✓	Restricted discretionary	✓	Restricted discretionary	Non-complying
South Taranaki District	2017	✓	Non-complying	✓	Restricted discretionary and non-complying	✓	Restricted discretionary	Non-complying
Palmerston North City	2017	✓	Non-complying	✓	Restricted discretionary and non-complying	✓	Restricted discretionary	Non-complying
Whanganui District	2017	✓	Non-complying	✓	Non-complying	✓	Restricted discretionary	Non-complying
Ōpōtiki District	2019	✓	Non-complying	✓	Restricted discretionary and non-complying	✓	Restricted discretionary, discretionary and non-complying	Non-complying
Manawatū District	2019	✓	Non-complying	✓	Restricted discretionary and non-complying	✓	Restricted discretionary	-

District / Unitary Plan	Year operative	Sensitive activities, buildings or structures in the National Grid Yard		Earthworks in the National Grid Yard		Subdivision in National Grid Subdivision Corridor		
		Rules in Plan	Activity status	Rules in Plan	Activity status (standard/s not achieved)	Rules in Plan	Activity status (standards achieved)	Activity status (standard/s not achieved)
Christchurch City	2017	✓	Non-complying	✓	Non-complying	✓	Restricted discretionary	Non-complying
Invercargill City	2017	✓	Non-complying	✓	Non-complying	✓	Discretionary	Non-complying
Hurunui District	2017	✓	Non-complying	✓	Non-complying	✓	Controlled	Non-complying
Kāpiti Coast District	2018	✓	Non-complying	✓	Restricted discretionary and non-complying	✓	Restricted discretionary	Non-complying
Dunedin City	2023	✓	Non-complying	✓	Non-complying	✓	Restricted discretionary	Non-complying
Queenstown-Lakes District	2023	✓	Non-complying	✓	Non-complying	✓	Restricted discretionary	Non-complying
Central Hawke's Bay District	2024	✓	Non-complying	✓	Restricted discretionary and non-complying	✓	Controlled	Non-complying
Waikato District Council	2024	✓	Non-complying	✓	Restricted discretionary and non-complying	✓	Restricted discretionary	Non-complying
Councils underway with consultation processes to implement the National Grid Corridors								
Marlborough Proposed Marlborough Environment Plan 2016	Appeals	✓	Subject to appeal	✓	Subject to appeal	✓	Restricted discretionary	Subject to appeal

District / Unitary Plan	Year operative	Sensitive activities, buildings or structures in the National Grid Yard		Earthworks in the National Grid Yard		Subdivision in National Grid Subdivision Corridor		
		Rules in Plan	Activity status	Rules in Plan	Activity status (standard/s not achieved)	Rules in Plan	Activity status (standards achieved)	Activity status (standard/s not achieved)
New Plymouth District PDP 2019	Appeals	✓	Non-complying	✓	Restricted discretionary and non-complying	✓	Restricted discretionary	Non-complying
Selwyn District PDP 2020	Appeals	✓	Non-complying	✓	Restricted discretionary and non-complying	✓	Restricted discretionary	Non-complying
Taupō District Plan (Proposed Plan Change 42) 2022	Appeals (rural zones only)	✓	Non-complying	*	-	✓	Restricted discretionary	Non-complying
Te Tai o Poutini PDP 2022 (Combined West Coast District Plan)	Hearings	✓	Non-complying	✓	Restricted discretionary	✓	Controlled	Non-complying
Timaru District PDP 2022	Hearings	✓	Non-complying	✓	Restricted discretionary	✓	Restricted discretionary	Non-complying
Waitomo District PDP 2022	Hearings	✓	Non-complying	✓	Non-complying	✓	Discretionary	-
Wellington City PDP 2022	Hearings/appeals (two stages)	✓	Non-complying	✓	Restricted discretionary	✓	Restricted discretionary	Non-complying
Gore District PDP 2023	Hearings	✓	Discretionary	✓	Non-complying	*	-	-

District / Unitary Plan	Year operative	Sensitive activities, buildings or structures in the National Grid Yard		Earthworks in the National Grid Yard		Subdivision in National Grid Subdivision Corridor		
		Rules in Plan	Activity status	Rules in Plan	Activity status (standard/s not achieved)	Rules in Plan	Activity status (standards achieved)	Activity status (standard/s not achieved)
Nelson City Resource Management Plan (Proposed Plan Change 29 2023)	Hearings (residential zones only)	✓	Non-complying	x	-	✓	Restricted discretionary	Non-complying
Wairarapa Combined PDP 2023	Hearings (Wairarapa Combined District Plan)	✓	Non-complying	✓	Non-complying	✓	Restricted discretionary	Non-complying
Mackenzie District Plan (Proposed Plan Change 27) 2024	Appeals	✓	Non-complying	✓	Non-complying	✓	Restricted discretionary	Non-complying
Tasman District	Pre-notification	x	-	x	-	x	-	-
Waitaki District	Pre-notification	x	-	x	-	x	-	-
Councils that have not yet started any process to give effect to Policies 10 and 11 of the NPSET⁷								
Wairoa District	N/A	x	-	x	-	✓	Controlled	-

⁷ These are councils that have not instigated any consultation to give effect to the NPSET (that Transpower is aware of). The district plans may have some provisions that regulate activities near the National Grid, but the provisions may not give effect to the NPSET.

District / Unitary Plan	Year operative	Sensitive activities, buildings or structures in the National Grid Yard		Earthworks in the National Grid Yard		Subdivision in National Grid Subdivision Corridor		
		Rules in Plan	Activity status	Rules in Plan	Activity status (standard/s not achieved)	Rules in Plan	Activity status (standards achieved)	Activity status (standard/s not achieved)
Tararua District	N/A	✓	Discretionary	x	-	x	-	-
Gisborne District	N/A	No provisions necessary – No National Grid infrastructure located in this jurisdiction						
Kaikōura District	N/A	No provisions necessary – No National Grid infrastructure located in this jurisdiction						
Chatham Islands	N/A	No provisions necessary – No National Grid infrastructure located in this jurisdiction						
Westland District	N/A	No National Grid infrastructure located in this jurisdiction, albeit there are National Grid provisions included within the Te Tai o Poutini Proposed District Plan.						