

## Your Comment on the Haldon Solar

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email to [substantive@fasttrack.govt.nz](mailto:substantive@fasttrack.govt.nz).

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
<b>Organisation name (if relevant)</b>	Transpower New Zealand Limited		
<b>First name</b>	Sarah		
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<b>Home phone / Mobile phone</b>	██████████	<b>Work phone</b>	██████████
<b>Email (a valid email address enables us to communicate efficiently with you)</b>	████████████████████		

2. We will email you draft conditions of consent for your comment			
X	I can receive emails and my email address is correct	<input type="checkbox"/>	I cannot receive emails and my postal address is correct

## 1. Background

- 1.1 Transpower New Zealand Limited (**Transpower**) has been invited to comment on the Haldon Solar Project (the **Project**) under section 53(2)(i) of the Fast-track Approvals Act 2024 (**FTAA**) as the owner of adjacent land. Transpower is also the occupier of the land to which the Substantive Application relates (section 53(2)(h)). Thank you for the opportunity to provide comments.
- 1.2 Transpower is the State-Owned Enterprise that plans, builds, maintains, and operates New Zealand's high voltage transmission network - The National Grid. The National Grid comprises around 11,000 km of transmission lines and cables, and some 164 substations. It links generators to distribution companies and major industrial users from Kaikohe in the North Island to Tiwai Point in the South Island. Transpower's principal role is to ensure the reliable supply of electricity throughout the country and, therefore, has a significant interest in ensuring that development does not adversely affect the operation, maintenance, upgrading and development of the existing transmission network.

## 2. The Project and Transpower's engagement to date

- 2.1 The Project proposes to construct and operate a solar farm across approximately 320 hectares, and connect and supply electricity to the National Grid via a new Grid Injection Point (GIP) substation. Transpower would construct and operate the Transpower portion of the substation and maintain a long-term presence at the site.
- 2.2 The Benmore to Islington 220 kV transmission line (**BEN-ISL A line**) traverses the Project site. The line is not designated, and Transpower relies on Policy 11 and 12 of the National Policy Statement for Electricity Networks 2008 (**NPS-EN**) to protect the line.
- 2.3 Transpower has had some discussions with the Applicant about the connection to the National Grid. Transpower operates a Queue Management Framework for managing investigations into generation connections. The Project is at the front of the queue, and we anticipate that our investigation into the connection to the National Grid could commence in the next few months.
- 2.4 The Applicant sought feedback from Transpower on the draft substantive application. Transpower provided review comments on 20 May 2025 – provided in 'Appendix 12 – Transpower consultation' of the Substantive Application.
- 2.5 Transpower is satisfied that Section 8.7 of the Substantive Application accurately reflects the consultation undertaken by the Applicant and that our feedback ('Appendix 12 – Transpower consultation' of the Substantive Application) has been sufficiently incorporated into the proposed consent conditions.
- 2.6 Transpower's general position is neutral in relation to the merits of the Project. However, Transpower wishes to ensure that construction works in proximity to the BEN-ISL-A line do not adversely impact on Transpower's ability to operate and maintain these nationally significant assets, and appropriate conditions are imposed on any consents granted.

## 3. Statutory Context

### ***National Policy Statement for Electricity Networks 2008 (NPS-EN) amended 2025***

- 3.1 The provisions of the NPS-EN must be taken into account by the Panel, in making its decision on the Project (FTAA, Sch 5, cl 17(1)(b) and Resource Management Act (**RMA**), s104(1)(b)(iii)), and the protection of it. The NPS-EN confirms:

the national significance of the National Grid (NPS-EN objective and policy 1); and  
the need to appropriately manage activities and development under, and close to, it to ensure that the Grid is not compromised (policy 11).

3.2 The objective of the NPS-EN is as follows:

*The national significance of the electricity network is recognised, protected and provided for, so that the network:*

- (a) is upgraded, improved and resilient to provide for the social, economic and cultural wellbeing of present and future generations and their health and safety;*
- (b) is developed and operated in a timely, efficient and ongoing manner while managing adverse effects from or on the EN; and*
- (c) supports achievement of New Zealand's climate change mitigation and renewable energy targets.*

3.3 The NPS-EN contains 14 Policies. In particular, Policy 1 requires decision-makers to:

- (a) recognise and provide for the national significance of the EN; and*
- (b) provide for the ongoing benefits of the EN to be realised at national, regional and local scales, relative to any localised adverse effects.*

3.4 Policy 11 requires that all decision-makers:

*Manage adverse effects of activities undertaken by third parties on the EN, including by:*

- (a) avoiding direct effects on the EN;*
- (b) avoiding reverse sensitivity effects on the EN, to the extent reasonably possible; and*
- (c) ensuring that the effective operation, maintenance, upgrading and development of the EN is not compromised.*

#### **Mackenzie District Plan 2004**

3.1 The Mackenzie District Plan (**Plan**) must also be taken into account by the panel (FTAA, Sch 5, cl 17(1)(b) and Resource Management Act (**RMA**), s104(1)(b)(vi)). The Plan gives effect to the NPS-EN and also contains policies that recognise the significance of the Grid and the need to protect it.

3.2 The Mackenzie District Plan gives effect to the NPS-EN. In particular, Objective 3 of the Infrastructure Chapter is as follows:

*The efficient, effective and safe operation, maintenance, upgrading and development of regionally significant infrastructure and lifeline utility infrastructure is not constrained or compromised by other activities.*

3.3 Policy 9 of the Infrastructure Chapter requires that:

*Within the National Grid Yard, avoid sensitive activities, and avoid earthworks, buildings and structures that may compromise the safe, effective and efficient operation, maintenance, upgrading and development of the National Grid, or constrain access to it.*

3.4 The NGY is a 12-metre setback either side of the centreline of a National Grid, and 12 metres from the closest visible edge of all support structures.

#### **The New Zealand Electrical Code of Practice for Electrical Safe Distances - NZECP34:2001**

3.5 NZECP34:2001 is a mandatory code of practice pursuant to the Electricity Act 1992, which sets minimum safe distances from overhead transmission lines to protect persons, property, vehicles and mobile plant from harm or damage from electrical hazards. The Code establishes safe clearance distances to buildings and structures, the ground (including stockpiles of earth and filling activities), and other lines, as well as how close buildings, structures and excavations can occur to poles and towers. All works proposed by the Project must comply with the NZECP34:2001 requirements.

#### **4. Matters of Interest to Transpower - can be addressed in conditions**

- 4.1 Project activities that can potentially impact the National Grid are construction of physical infrastructure, earthworks, including for access track and landscaping. Transpower considers that conditions imposed on the application are sufficient to address these potential impacts. An additional condition may be required should landscaping be proposed.

##### ***Set-back from National Grid Assets***

- 4.2 BEN-ISL A line traverses the northern half of the Project site including multiple support structures (BEN-ISL A0070, BEN-ISL A0071, BEN-ISL A0072 and BEN-ISL A0073).
- 4.3 The part of the site traversed by the BEN-ISL A line is subject to the National Grid Yard (NGY).
- 4.4 Transpower seeks to keep the NGY free of activities which may directly or indirectly impact the National Grid, and compromise its operation and maintenance of the National Grid. Based on the site layout plan, the solar panels will be setback at least 12 metres from the National Grid transmission line, including its support structures. Condition 1 requires that the development is carried out in general accordance with the site layout plan. Transpower is satisfied that Condition 39 addresses the requirement to maintain ongoing access to the National Grid.
- 4.5 All development near the National Grid must comply with the mandatory clearance requirements of NZECP34:2001, specifically relating to building/structure to conductor clearance, ground to conductor clearance, disturbance of land around National Grid support structures, mobile plant operation, fencing and vegetation. Transpower is satisfied that Condition 37 addresses the requirement to comply with NZECP34:2001.
- 4.6 Transpower considers that an additional condition may be required, should landscaping and screen planting be proposed as the Project progresses through the consent process. Section 4.2.3 of the Substantive Application notes that *“No landscape planting is required or proposed to integrate the power stations into their surroundings as they will be screened from view from public areas.”* Should vegetation be planted around the site perimeter to screen the site, vegetation within the NGY must not exceed 2 metres in height at full maturity and must comply with the Electricity (Hazards from Trees) Regulations 2003, or any subsequent revision of the regulations. Vegetation planted outside of 12 metres either side of the centreline of the transmission line must be setback sufficiently to ensure that trees cannot fall within 4 metres of the transmission lines.
- 4.7 In addition, any planting in proximity of National Grid Support Structures must be setback by at least 2 metres, with at least one side of National Grid Support Structure kept free from trees or vegetation in order to provide Transpower with access for operation and maintenance activities.
- 4.8 Should any planting around the perimeter of the site that extends into the NGY be proposed during consideration of the resource consent application, Transpower considers that the setbacks above should be the subject of a consent condition.

##### ***Construction Management Plan***

- 4.9 Given the proximity of the proposed works to the BEN-ISL A line, works will need to be carefully managed to avoid any impacts on the National Grid and minimise risk to people and plant during the construction of the solar farm. Proposed conditions 9-13 outline the requirements of the Construction Management Plan and opportunity for Transpower’s review.
- 4.10 Transpower is satisfied that conditions 9-13 are appropriate for managing construction works near the National Grid. In particular, condition 10(h) requires ongoing access to the transmission line and support structures during and after construction. condition 11(d) requires the demonstration of NZECP34:2001 minimum approach distances (i.e., minimum required distance between wires / conductors and large construction plant).

##### ***Competing grid connections***

4.11 We note for completeness that Transpower provided the following to the Applicant in response to points raised in Minute 5 about the ability for competing projects in proximity to obtain a grid connection:

- *A Transpower Works Agreement (TWA) guarantees the capacity of the generators specific connect assets at the generators connection location but does not guarantee access to wider transmission capacity, for example transmission line capacity. Wider transmission capacity is allocated in real time through the electricity market dispatch function on a competitive market basis. The order in which competing generation commissioned has no bearing.*
- *Connection rights are allocated on a “first-ready” basis, but in line with the point above, this only applies to the connection assets at the connection location and not to wider transmission capacity.*
- *There is nothing preventing both projects from connecting, nor does the presence or absence of a TWA give either project an inherent advantage. As the proposed connections are in different physical locations the allocation of connection assets for one project has no impact on the allocation of connection assets for the other project. Neither allocation has an impact on access to wider transmission capacity.*