



SECTION 53 COMMENTS NATIONAL GRID RESPONSE

Project	Waikanae North Development
Application reference	FTAA-2603-1194
Site	169-171 Peka Peka Road, Waikanae, Kapiti Coast
Document	Response to comments received under section 53, Fast-track Approvals Act 2024 National Grid
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Status	Final

1. Purpose and scope

This report responds to the comments received under section 53 of the Fast-track Approvals Act 2024 on the Waikanae North Development substantive application (FTAA-2603-1194) that relate to the national grid. It forms part of a set comprising a covering note addressing planning, legal and conditions matters, individual topic area reports, and a tabulated response covering every comment received.

This report is specific to comments from Transpower New Zealand about the National Grid (comment 29). It responds to each point raised in Transpower's comment, following Transpower's own numbering. It is supplemented by the Landscape response that picks up on a limited number of Transpower comments.

Transpower's comment states that the applicant's proposed conditions, together with its requested amendments at Appendix B Table B1 appended to its comments, will be sufficient to address most matters of concern; its residual position -(that consent not be granted until a site-specific flood assessment for the two affected structures is provided) - is addressed at paragraphs 5.12–5.15 below.

For each paragraph of Transpower's comment, this report sets out a resolved response.

2. Author(s) and Code of Conduct

This response has been prepared by Joseph Harris of Landlink Limited and Ray O'Callaghan of O'Callaghan Design Limited.

Although this document has not been written as a statement of expert evidence, we confirm that at all times we have complied with the Environment Court's Code of Conduct for Expert Witnesses contained in its Practice Note 2023.

3. Supporting documents attached to this response

WNDL has reviewed the proposed earthworks concept against the requirements of NZECP34:2001 referenced in Transpower's proposed conditions (Appendix B, Table B1), and against the concept development surface and landscaping plans, using the attached Transpower coordination sections and the 12 m setback figure set. This review underpins WNDL's assessment and response to the matters raised. Following this review our conclusion is that there will be no issue in meeting Transpower's proposed conditions.

This response refers to new plans and sketches that have been prepared to assist with interpretation of technical information. These new documents are attached in Appendix 1 and include:

- Drawings 2911-P0-100, 055 & 056-Rev A – Transpower Coordination Plans – showing earthworks and some flood levels;
- Drawings 2911-P0-100, 055 & 056-Rev B - Transpower Coordination Plans – revised plans showing additional earthworks and flooding matters;
- 2911-12m-Setback-Figure-Set - access, planting and vegetation matters, pylon-by-pylon, against the 12 m setback sought by Transpower.
- Drawing 2911-S1-001-A – Topographical survey of towers 3 & 4.

4. Response by paragraph

4.2–4.3 National Grid Yard corridor and 23 m blowout envelope

Comment. "Transpower requests the NGY Corridor is clearly shown on all scheme plans and "Transpower requests the plan referred to in the corresponding consent Conditions (regional consent condition 140 and land use consent condition 12) is prepared and forms part of the Substantive Application." (paras 4.2–4.3)

Response. The National Grid Yard (12 m either side of centerline, 12 m from support structures) and the 23 m blowout envelope are shown together on the Transmission Corridor Constraints Plan 2911-P0-100-Rev A (**attached** to this response for convenience), that has previously been provided to Transpower. This plan has been subsequently amended to Rev B to include additional flood level information that has been requested, Rev B is also **attached** to this response. The amended Rev B plan can be referenced directly in Conditions 140(d)/12(d). This meets the request.

4.4 Access under section 23, Electricity Act 1992

Comment. "Transpower has a right to access its existing assets under s23 of the Electricity Act 1992. Any future buildings, structures, wetlands, stormwater management areas or vegetation planting must be located to ensure vehicle access is maintained to the National Grid transmission lines and National Grid support structures, for maintenance at all reasonable times, and emergency works at all times." (para 4.4)

Response. A sketch showing the location of each of the 5 towers within the site is shown in the drawing "12m Set Back Figure Set" that was previously supplied to Transpower (and is **attached** to this response). The sketch for each tower shows a minimum 6m wide access corridor to each tower. The proposed surface on which the access is expected to be formed is intended to be a grass surface. However, as this provides for Transpower vehicle access, including provision for heavy vehicles, it is intended to undercut the access corridor to a depth

of no less than 0.3m and place a compacted layer of metal to form a firm base for vehicles and to place a thin layer (less than 50mm) of topsoil over the accessway to provide a green cover on the surface to reduce visual impact, increase amenity value and reduce the risk of dust generation. These elements can be incorporated into Condition 13, as proposed by Transpower, and they are accepted by WNDL. WNDL will incorporate this into the next issue of proposed consent conditions. These elements will result in improved ground conditions and access to Transpower's assets.

4.5 Reserve classifications

Comment. "...the land underneath, and in proximity to, the National Grid assets is proposed to be used as a combination of Recreational Reserve, Local Purpose Reserve Stormwater and Local Purpose Reserve (Ecological Site). Specifically, wetland areas / stormwater ponds will be established within the proposed reserve meaning National Grid support structures BPE-HAY-A0244 - BPE-HAY-A0246, and BPE-HAY-B0230 – BPE-HAY-B0231 will be located within the proposed reserve area noted above... Transpower does not oppose the establishment of green space and recreational reserve within the National Grid corridor, provided the space is appropriately designed and managed..." (para 4.5)

Response. This comment is noted. Per the Scheme Overview plan (Appendix 04A of the Substantive Application), the land classification at each structure is as follows: BPE-HAY-B-0231 (Pylon 1) - private open space, wetland restoration; BPE-HAY-A-0246 (Pylon 2) - private open space, wetland restoration; BPE-HAY-B-0230 (Pylon 3) - private open space, wetland restoration; BPE-HAY-A-0245 (Pylon 4) - Local Purpose Reserve (Stormwater); BPE-HAY-A-0244 (Pylon 5) - Recreation Reserve. The indicative land use adjacent to these towers is shown in the sketches labelled "11 2911-12m Setback Figure Set" (referred to in 4.4). Access and vegetation control in these areas are discussed in other sections of this response.

4.6 Access width, gate width and 12 m flat working area

Comment. "Transpower requires access to the National Grid support structures must be at least 6 metres in width to allow for access by large mobile plant... any gates providing access to the National Grid assets shall be at least 4 metres wide... Transpower requests that a flat area, with only grass ground cover, be provided around each National Grid support structure extending 12 metres from the outer edge of the tower foundations..." (para 4.6)

Response. WNDL has reviewed the current landscape plans against the 12 m Setback Figure Set and, on that basis, accepts Condition 13 as proposed by Transpower. Where existing terrain is not flat or suitable for machine access regardless of planting - for example, where terrain within 12 meters of the outer edge of a tower batters down into a wetland - it is considered reasonable for wetland buffer planting to remain in that specific area, since the existing terrain does not presently provide practical machine access in any case. In other words, there is no basis for Transpower to seek better outcomes than it currently enjoys on the site - having erected the pylons in their present locations and with full knowledge and acceptance of existing ground conditions. WNDL will update proposed conditions to confirm this matter.

4.7 Access-through-reserve plans

Comment. "Transpower requested that the Applicant provide plans showing the proposed access through the areas of reserve / open space to each of the National Grid support structures. This detail is not included in the Substantive Application." (para 4.7)

Response. The intended access-track locations are shown on the attached 12 m Setback Figure Set. The access approach at each structure is overlaid on the landscape plan. Design intent for access is described in 4.4 above. The landscape plans will be updated to reflect it, secured by condition.

4.8 Access to BPE-HAY-A-0247

Comment. "Transpower requests the relevant Landscape Plans are updated to show the intended access tracks to assess suitability and ensure there are no impediments to access... Transpower is concerned around the provision of access to National Grid support structure BPE-HAY-A0247 within the Eastern Wetlands area, which is shown as being compromised due to wetland buffer planting and stream riparian planting. An access track from the adjacent road to the north, through to National Grid support structure BPE-HAY-A0247, with 12 metre working space around the structure, shall be shown on the Landscape Plan." (para 4.8)

Response. Transpower's Asset Map (Appendix A attached to Transpower's s53 comments) shows BPE-HAY-A-0247 south of the WNDL site boundary. WNDL requests Transpower confirm whether this reference is intended to be BPE-HAY-A-0246 (Pylon 2), the structure within the site with an equivalent wetland-buffer/riparian planting constraint. WNDL accepts that the relevant landscape plans will be reviewed and updated to show the intended access tracks (intended provision for BPE-HAY-A-0246 (pylon 2) is shown in the attached sketches "12 m Setback Figure Set"), and that Transpower may review those proposed amendments to confirm there are no impediments to access. Where the terrain at BPE-HAY-A-0246 slopes down into a wetland such that it does not provide practical machine access regardless of planting, WNDL's position is that suitable groundcover planting and a wetland buffer can be retained in that area but that all such planting must remain within Transpower's vegetation height limits. WNDL will update proposed conditions to confirm this matter.

4.9 Access to BPE-HAY-A-0244 (Pylon 5, dog park)

Comment. "...does not give adequate consideration as to how access will be maintained to National Grid support structure BPE-HAY-A0244, located within the proposed dog park. A gate should be provided within the road frontage fence, of sufficient width to allow a vehicle to access the support structure... Transpower recommends the Applicant consider establishing an unimpeded access corridor along the southern boundary of the dog park, with a gravel track and vegetation limited to grass cover only... Transpower notes that the amenity planting shown around the park perimeter does not appear to be included in the planting palettes." (para 4.9)

Response. A gate of sufficient width will be provided in the road-frontage fence, and a formed access track from the road frontage to the structure, consistent with the 4 m gate width requested by Transpower Condition 13(b). This will be secured as a condition/plan-note item alongside Condition 18b. WNDL will update proposed conditions to secure this matter.

4.10 Walkways and shared paths

Comment. "Transpower recommends that any walkways / shared paths are setback from the National Grid support structures to the extent practicable, in order to minimise impacts on Transpower's ability to access the structures... directing the movement of people near support structures can result in an increased risk of the structures being climbed on or used for unintended purposes, which can create safety risks." (para 4.10)

Response. The dog park and pathway alignment relative to National Grid support structures can be resolved at detailed design, provided the constraint is recorded on the plans. At BPE-HAY-B-0230 (Pylon 3), the proposed path may run close to, or within, 12 m of the structure because of the adjacent stream constraining the practical alignment. This can be a shared maintenance and pedestrian access route, using the same formed corridor for both purposes.

4.11 Bench seats on the dog park pathway

Comment. "Transpower requests all bench seats are located outside of the NGY corridor for health and safety reasons and the plan of the dog park is updated in this regard." (para 4.11)

Response. Agreed in principle. The operative commitment is an unimpeded access strip along the relevant boundary of the dog park, consistent with the access corridor approach at 4.9. Bench seats and other park furniture can be sited clear of that strip with the exact seat positioning against the NGY to be confirmed at certified landscape plan stage.

This outcome will be secured through Condition 61a - the certified landscape plan, submitted to Transpower for comment before Council certification, will reflect this. WNDL will review proposed conditions and update as may be necessary to confirm this matter.

4.12–4.15 Flooding effects on National Grid support structures

Comment. "Transpower is concerned about the potential effects of the proposed development on the foundations of National Grid support structures... In particular, there is potential for increased flooding around support structure foundations, which could adversely affect their long-term structural integrity. These potential effects have not been adequately assessed in the Substantive Application."

"Transpower requests that the Applicant provide a site-specific assessment of the effects of the proposed development on floodwater levels and ponding around National Grid support structures BPE-HAY-A0244, BPE-HAY-A0245, BPE-HAY-A0246, BPE-HAY-B0230, and BPE-HAY-B0231. This assessment should quantify any change in floodwater depth, extent, duration, and frequency at each support structure location." (paras 4.12–4.15)

Response. The Awa flood modelling report confirms that, in the existing situation, the low-lying areas of the site are flood-prone, with ponding associated with existing open stream/drain channels. Existing flooding extent is mapped in the Kāpiti Coast District Plan. The proposed design retains that same general drainage and flood-storage pattern. No ground disturbance is proposed at either of the two affected structures.

Two of the five National Grid support structures are within the existing flood-affected area: BPE-HAY-B-0230 (Pylon 3) and BPE-HAY-A-0245 (Pylon 4). Surveyed top-of-footing levels (2911-S1, 4 August 2026, NZVD2016) are RL 6.48–6.49 m at Pylon 3 (three footings) and RL 6.30–6.45 m at Pylon 4 (four footings). The same survey records surrounding ground levels immediately adjacent to the tower footings as RL6.0 – 6.25. The land slopes away from each of these two towers within the immediate vicinity of each structure and drops to a typical level of RL 5.50. A ground survey was conducted on 04-08-2026 to assist with a greater investigation of ground levels at these two structures to inform this response. The surveyed levels are shown in attached plan 2911-S1-001-A.

In addition to obtaining more detailed ground level information at the two structures, we have interrogated the Awa flood model results in more detail to provide expected flood water levels at these two towers in the pre-development and post-development scenarios. These results are for the 2130-time window, which includes allowance for climate change. The assessment included the 2-year (50%AEP), 10-year (10%AEP), 50-year (2% AEP) and 100-year (1% AEP) design rainfall events.

The expected floodwater storage depths at the 5 towers for the 1% AEP event are shown in the table below:

Structure	Transpower ID	Existing ground RL (m NZVD2016)	Existing 100YR/1% AEP peak (2130)	Design 100YR/1% AEP peak (2130)

Pylon 3	BPE-HAY-B-0230	6.25	6.064 m	6.768 m
Pylon 4	BPE-HAY-A-0245	6.1 – 6.25	6.064 m	6.768 m
Pylon 1	BPE-HAY-B-0231	~11.0	Above flood levels	Above flood levels
Pylon 2	BPE-HAY-A-0246	~9.4–9.5	Above flood levels	Above flood levels
Pylon 5	BPE-HAY-A-0244	~9.4–10.2	Above flood levels	Above flood levels

The increased depth of flooding at pylons 3 & 4 is approximately 0.7m. The existing floodwater level, in a 1% AEP event, at towers 3 & 4 (RL6.06) is generally similar (in flooding terms) to the ground level at the footings of these two towers (RL6.1 – 6.25), - confirming the ground around both structures already experiences ponding adjacent to the tower footings under existing conditions.

When considering potential impact of surrounding floodwater on foundation stability it is helpful to understand the likely duration and velocity of the floodwater adjacent to foundations. A review of the Awa model output has established that the floodwater is relatively close to its maximum height up to 6 hours before the peak and drops very little in the 6 hours after the peak, as shown in the table below:

Event	Situation	-6 h	-3 h	Peak	+3 h	+6 h
2YR	Existing	5.727	5.831	5.834	5.809	5.774
2YR	Design	6.037	6.141	6.144	6.119	6.084
10YR	Existing	5.833	5.918	5.935	5.922	5.905
10YR	Design	6.341	6.426	6.443	6.430	6.413
50YR	Existing	5.881	5.976	6.004	6.002	5.995
50YR	Design	6.536	6.631	6.659	6.657	6.650
100YR	Existing	5.901	6.006	6.064	6.063	6.056
100YR	Design	6.605	6.710	6.768	6.767	6.760

Thus, any assessment of potential effects of floodwater should consider a duration exceeding 12 hours. The floodwater at this site has a very low velocity due to the very flat nature of the site and will be less than that required to remove grass cover. Hence scour potential at the towers is extremely low.

The table above includes the expected flood water levels for the other events. These results are also shown in drawings 2911-PO-100, 055 & 056-Rev B (attached).

Under the design scenario, modelled peak levels exceed all recorded footing levels at both structures for the 50YR and 100YR events, and exceed three of Pylon 4's four top of footing levels (RL 6.30–6.39 m) at the 10YR event; the design therefore increases the existing ponding to reach the footings directly in the larger events.

WNDL cannot offer a view on foundation performance or structural stability at BPE-HAY-B-0230 or BPE-HAY-A-0245. WNDL does not hold Transpower's foundation design or as-built information for these structures - they may be piled, given the peat and soft ground conditions across parts of the site, or unsuitable material may

have been excavated and replaced at construction. Without that information, WNDL cannot assess how a change in surface ponding would interact with the foundation.

A peat depth map, prepared from the site's geotechnical investigation data, is included in the application material at Appendix 06B (Earthworks Overview and Crossing Structures, Part 1), sheet 2911-ALL-EW-202, "Overall Peat Depth Map," Rev 02, dated 13 March 2026. This plan set depicts estimated peat thickness in the general eastern area of the site. It is provided as a spatial representation of the geotechnical investigation data, for context; it is not a conclusion about founding conditions at any of the five Transpower structures. This plan indicates a likely peat thickness of approximately 1.5m in the vicinity of pylon 4 and 0.5 – 1.0m adjacent to pylon 3. It is therefore considered likely that the peat was removed from beneath these two pylons as part of their construction.

The ground levels surveyed immediately surrounding both structures (shown in attached drawing 2911-S1-001-A) are below the modelled existing peak water level for every event, confirming the ground around each tower base already experiences ponding under existing conditions. In other words, the soils in the immediate vicinity of these foundations are already subject to periodic saturation under existing conditions for all 4 modelled flood events. The predicted existing flood water depth in a 2-year event is RL5.83. Although this level is 0.2 – 0.4m below the ground level at the base of the aboveground section of the concrete footings, it is at a level where it is within 2m distance from the tower footings, and thus sufficiently close that it is likely to have some influence on existing soil behaviour in flood conditions (if the soils are such that they are influenced by saturation). The flood water depth and proximity of the existing flood water to the concrete footings increases for the 10-year, 50-year and 100-year design rainfall events.

The proposed flood water detention system will increase the floodwater depth at these two towers, but they have been constructed in a situation where they are already exposed to wet conditions and flood events.

WNDL is happy to commit to ensuring it avoids any increased risk to tower foundation integrity. A detailed assessment of the existing and expected flood water presence adjacent to the two towers will be required to achieve this. That assessment will also need to consider actual tower foundation conditions and associated soil conditions. If the assessment concludes that there is an increased risk to foundation stability at towers 3 & 4, there are potential mitigation measures such as raising the existing land around the two towers to increase the separation of the floodwater from the towers and thus amend the ponded area to achieve greater separation.

WNDL agrees to a detailed design process that includes refined flood modelling at detailed design (GWRC condition 74 & KCDC condition 26). To ensure that this matter is properly attended to, WNDL proposes a new condition that provides for an assessment of tower foundation integrity to be finalised at detailed design stage, incorporating final flood model data, detailed design surface earthworks, tower foundation information (to be provided by Transpower) and soil conditions at each of the two towers. That assessment is to be submitted to Transpower for their review prior to work commencing on flood management infrastructure and will need to be certified as achieving avoidance of additional risk. WNDL will update proposed conditions to secure this outcome.

4.16–4.19 NZECP34:2001 - land disturbance and excavation limits

Comment. "Section 2.2.3 of NZECP34:2001 sets out the restrictions on excavation within 12 metres of the outer edge of tower foundations. Specifically, no excavation shall: (a) exceed a depth greater than 300mm within 6 metres... (b) exceed a depth greater than 3 metres between 6 metres and 12 metres... (c) create an unstable batter." ... "should the excavation not be able to comply... a dispensation will be required from Transpower (separate from the resource consent). There is no guarantee the dispensation will be provided..." (paras 4.18–4.19)

Response. A review of the pylon cross sections against NZECP34:2001 2.2.3 has been carried out. The preliminary design earthworks near the 5 towers on the site are shown in attached drawings 2911-PO-100, 045 & 055- Rev B. Stable batters (minimum 1V:3H unless otherwise certified) are the design basis for earthworks in the vicinity of each structure. As shown by the attached drawings, the requirements of NZECP34:2001 are met at all 5 towers. Transpower has proposed amendment to proposed condition 14 (KCDC consent condition) to specifically require earthworks to be in accordance with NZECP34:2001. WNDL agrees to this amendment and will update proposed conditions to confirm this matter.

4.17 Mobile plant clearance during construction

Comment. "...no mobile plant or large vehicles may come within 4 metres of the conductors of any transmission lines during construction. Accordingly, all machinery, mobile plant and vehicles operating within 23 metres of the transmission lines, and traversing beneath the lines, shall be limited to a maximum reach height of 4.1 metres." (para 4.17)

Response. WNDL does not agree with a specific clearance dimension being referenced in the conditions and considers that the concern regarding minimum clearance to Transpower's infrastructure is ensured by their proposed Condition 15, which requires the CEMP to detail all construction related matters regarding Transpower's infrastructure to demonstrate that the construction equipment and its proposed use will meet the requirements for minimum clearance set by NZECP34:2001.

WNDL accepts the alternative wording proposed by Transpower for condition 15, (subject an amendment to their 15(f) as discussed in Section .. below) and consider the revised condition 15 will deal appropriately with the matter of minimum clearances. WNDL will update proposed conditions to confirm this matter.

4.20 Ponding and drainage effects on foundations

Comment. "Any earthworks undertaken in proximity to National Grid support structures shall avoid the damming or ponding of water around the tower foundation. Similarly, any changes to the stormwater drainage patterns and runoff characteristics arising from the works shall not result in any adverse effects on the foundations of the tower." (para 4.20)

Response. This is the same requirement as sought through amended Condition 14(e) of Appendix B, in narrative rather than conditions form. See the response at 4.12–4.15 above and in respect of Appendix B below.

4.21–4.22 Ground-to-conductor clearance (8 m minimum)

Comment. "...conductor to ground clearances, cannot be reduced to less than 8 metres (7.5 metres in accordance with Table 4 of NZECP34:2001 plus a 0.5 metre tolerance as required by Transpower) for the BPE-HAY-A and BPE-HAY-B National Grid transmission lines." (para 4.22)

Response. NZECP34:2001 is a binding standard. WNDL's assessment is that a local lowering to approximately RL 6.8 m NZVD2016 at the location identified at 4.24 below appears feasible without materially changing the application engineering. WNDL accepts Condition 14c, as proposed by Transpower, in relation to this requirement. WNDL will update proposed conditions to confirm this matter.

4.23 Stockpiling within the clearance corridor

Comment. "No fill or material shall be stockpiled or deposited such that the aforementioned conductor to ground clearance would be infringed. Additionally, Transpower does not support the stockpiling of materials or

storage of equipment beneath the National Grid transmission line or within 12 metres of any National Grid support structure." (para 4.23)

Response. This matter is accepted - see Condition 14b, below. WNDL will update proposed conditions to confirm this matter.

4.24 Road south of the dog park (proposed Lot 4049)

Comment. "...the ground to conductor clearance of the road located to the south of the dog park (proposed lot 4049) will not comply with the NZECP34:2001 requirement of 7.5m plus the 0.5m tolerance required by Transpower. Transpower requested the design of this road was revised to lower the road by at least 0.4 m to meet the NZECP34:2001 clearance requirements. It does not appear that this matter has been addressed in the Substantive Application and remains outstanding." (para 4.24)

Response. Transpower's requirement is achievable. The road sits under the transmission line span between BPE-HAY-A-0245 (Pylon 4) and BPE-HAY-A-0244 (Pylon 5). The required clearance can be achieved by relocating the road's vertical sag point to coincide with the transmission line crossing - a refinement of the road's vertical geometry, not a change to its function or alignment. Based on WNDL's engineering review, there is no reason it cannot accept Condition 14a in relation to this requirement. WNDL will update proposed conditions to confirm this matter.

4.25 Fencing

Comment. "Transpower does not support the installation of long lengths of conductive fencing parallel to transmission lines for electrical safety reasons. No conductive fencing shall be installed within 5 metres of a National Grid support structure." (para 4.25)

Response. This is consistent with our documents (refer to drawings LA3.02 and LA3.03 for fencing information). WNDL will review the proposed conditions to confirm that this matter is adequately covered.

4.26–4.28 Vegetation within the National Grid Yard and the 12 m setback

Comment. "...any new vegetation planted within the NGY should be less than 2 metres in height at full maturity... Any planting in proximity to National Grid support structures must be setback by at least 12 metres in order to provide Transpower with access for operation and maintenance activities." ... "species such as Kahikatea, Kowhai and Totara, which have the potential to grow over 2 m in height at maturity, could be planted within NGY." (paras 4.26–4.28)

Response. Secured through proposed Transpower Conditions 18, 18a and 18b, which are accepted subject to the two clarifications on Condition 18b set out in Appendix B below. The 12 m position has been reviewed at each of the five structures against the current landscape arrangement and is achievable through a combination of existing grassed areas, targeted landscape-plan amendments, and detailed design coordination. WNDL will update proposed conditions to confirm this matter.

4.29 Construction Environmental Management Plan

Comment. "...Transpower will require the preparation of a Construction Management Plan (CMP) prior to commencing any construction works and earthworks within 50 metres of the BPE-HAY-A and BPE-HAY-B National Grid assets." (para 4.29)

Response.- Proposed condition 15 of the KCDC consent conditions deals with the preparation and approval of a Construction and Environmental Management Plan. WNDL agrees with the proposed revised wording of condition 15, except for condition 15(f). As discussed in Section 4.12-4.15 above, the existing flood patterns adjacent to towers 3 & 4 may have some existing adverse effect on the foundations of these towers. WNDL therefore would agree to an amendment of condition 15(f) as discussed in **Appendix B** below. WNDL will update proposed conditions to confirm this matter.

4.30 Earth Potential Rise

Comment. "...any development within the site may be subject to potential Earth Potential Rise (EPR)... An EPR Assessment will be required for all buildings and structures located within 50 metres of National Grid support structures." (para 4.30)

Response. This request is accepted. An Earth Potential Rise assessment is already committed in principle for buildings and structures within 50 m of a support structure, secured by condition pre-building-consent. Condition 19 (below) reflects this. WNDL will update proposed conditions to confirm this matter.

4. Conditions - Appendix B - Table B1 conditions response

WNDL's response to each condition proposed or amended by Transpower at Appendix B, Table B1 of its comment is set out below. Applicant's original text appears in the left-hand column of Transpower's table; Transpower's amendments are shown there as insertions and deletions.

WNDL accepts all conditions set out in Appendix B, Table B1, as proposed by Transpower, subject to the comments recorded in the table above and the amendments proposed below to Conditions 14(d), (e), 15(f) and 18b, and subject to confirming the timing trigger for Condition 61a.

WNDL will update proposed conditions to confirm these changes.

Condition	Transpower's ask	WNDL position
140 (regional)	23 m blowout distance stated explicitly; new (d) requiring a drawing showing the NGY	Accepted.
12 (land use)	Mirrors Condition 140	Accepted, on the same basis as Condition 140.
13	Registered on lots within 12 m of a structure; access-route wording clarified; new (bb) 4 m minimum gate opening	Accepted.
14(a), (b), (c), (e)	Terminology substitution only	Accept (a), (b) and (c) - terminology substitution only, no change from WNDL's own proposed wording. Accept (e) with modification - see full text below.

14(d)	"No works shall result in ponding of water around National Grid support structure foundations."	Not accepted - WNDL requests this condition be deleted. See full reasoning at 4.12 – 4.15.
14a (new)	Submit a plan of road-level formation for any road within 23 m of centreline, demonstrating not less than 8 m clearance	Accepted, subject to a proposed timing trigger: at detailed design, prior to construction of any road within 23 m of the centreline.
14b (new)	No material stockpiled within 12 m of centreline	Accepted.
14c (new)	No land disturbance within 12 m of centreline reducing clearance below 8 m	Accepted.
15	Construction Environmental Management Plan content list, including 15(f) - drainage/stormwater changes not to adversely affect foundations	Not accepted. WNDL requests 15(f) rewording to state “... will avoid any additional adverse effects on the foundations of any support structure”.
18	2 m maturity limit within the NGY, tied to the Electricity (Hazards from Trees) Regulations 2003	Accepted.
18a (new)	Planting outside 12 m NGY but within 23 m, setback so it cannot fall within 4 m of the lines	Accepted.
18b (new)	12 m setback from the outer edge of the visible foundation for all new trees/vegetation	Accepted the principle; not accepted in full as worded - WNDL proposes an amendment to clarify the setback does not apply to groundcover/low planting or non-trafficable terrain. See full text below.
19	Wording clarity only	Accepted.
20	Restated as a formal heading	Accepted.
20a (new)	10 working days' written notice before commencing works	Accepted.
61a (new)	Landscape/ecological restoration plans to Transpower 20 working days before KCDC certification	Accepted..

Conditions 14(d) and (e) - proposed amendment

Condition (d) - WNDL's position: request deletion. The ground surrounding BPE-HAY-B-0230 (pylon 3) and BPE-HAY-A-0245 (pylon 4) already experiences ponding in the existing environment (see paragraphs 4.12–4.15 above and the surveyed levels at 2911-S1); the design increases the depth and extent of that ponding rather than introducing it. This matter is instead addressed through amended Condition (e), below.

Condition (e) - applicant's original: "any changes to ground levels or drainage patterns shall not adversely affect the integrity of transmission structures."

Proposed Condition (e) - WNDL's proposed condition (redraft): "any changes to ground levels or drainage patterns shall not adversely affect the integrity of National Grid support structures. This shall be confirmed by the Consent Holder submitting a detailed assessment report to Council, with a copy to Transpower, at the time of detailed design, addressing any ground level changes and/or changes to drainage patterns affecting the structures."

Condition 18b - proposed amendment

This is a wholly new condition proposed by Transpower.

Transpower's proposed condition (Table B1): "Any proposed new trees or vegetation must be setback from the outer edge of the visible foundation of the National Grid Support Structures BPE-HAY-A0244 - BPE-HAY-A0246, and BPE-HAY-B0230 – BPE-HAY-B0231 by at least 12 metres."

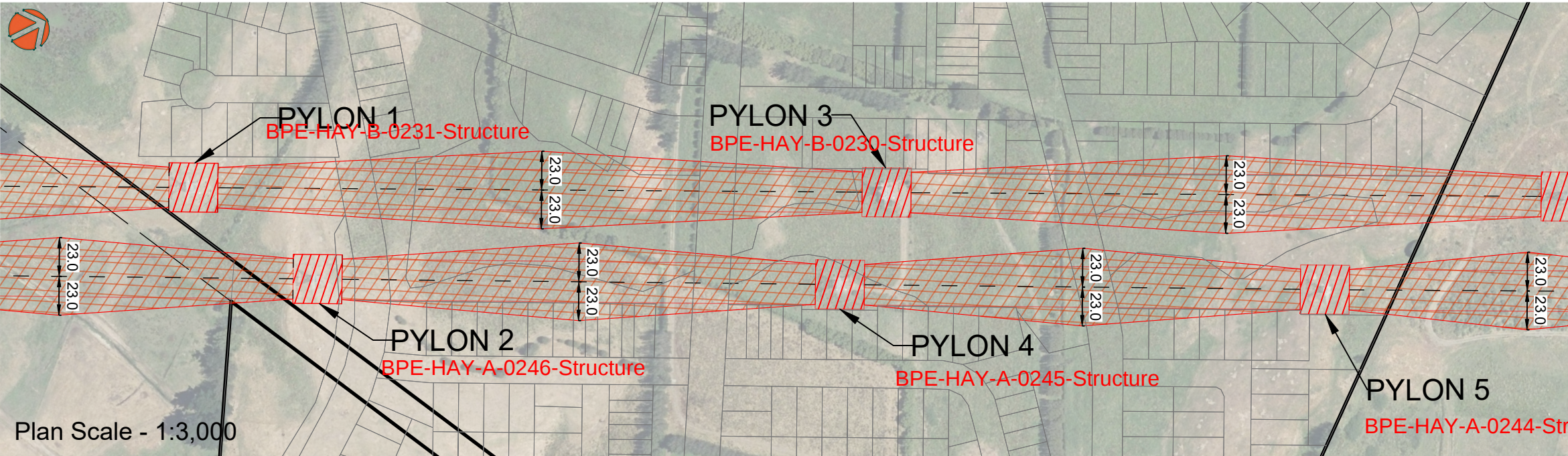
WNDL's proposed condition (redraft): "Any proposed new trees or vegetation must be setback from the outer edge of the visible foundation of the National Grid Support Structures BPE-HAY-A0244 - BPE-HAY-A0246, and BPE-HAY-B0230 – BPE-HAY-B0231 by at least 12 metres, except that groundcover and low shrub planting may be retained within 12 metres where existing landform limits practical machine access, as shown on the attached 12 metre setback figure set."

What has changed, and why: Condition 18 already permits vegetation up to 2 m in height at maturity within the wider National Grid Yard; 18b as drafted would prohibit low groundcover planting within 12 m of a structure while permitting the same planting immediately beyond it, which does not serve the maintenance-access purpose the condition is directed at. The attached 12 m Setback Figure Set itself proposes retaining groundcover and wetland buffer planting within 12 m at several structures, specifically where the existing landform does not provide practical machine access regardless of what is planted there. WNDL's amendment carves out both situations, so the condition achieves its purpose without requiring planting to be removed where it delivers no corresponding access benefit.

Conditions 13, 18b and 61a are proposed as consent notices registered on lots containing, or within 12 m of, a National Grid support structure. Those structures sit within land proposed to vest as reserve in Council. WNDL requests Transpower's and Council's confirmation of the appropriate mechanism to secure these obligations once vesting occurs, noting a consent notice may not be the standard instrument on reserve land vested in Council.

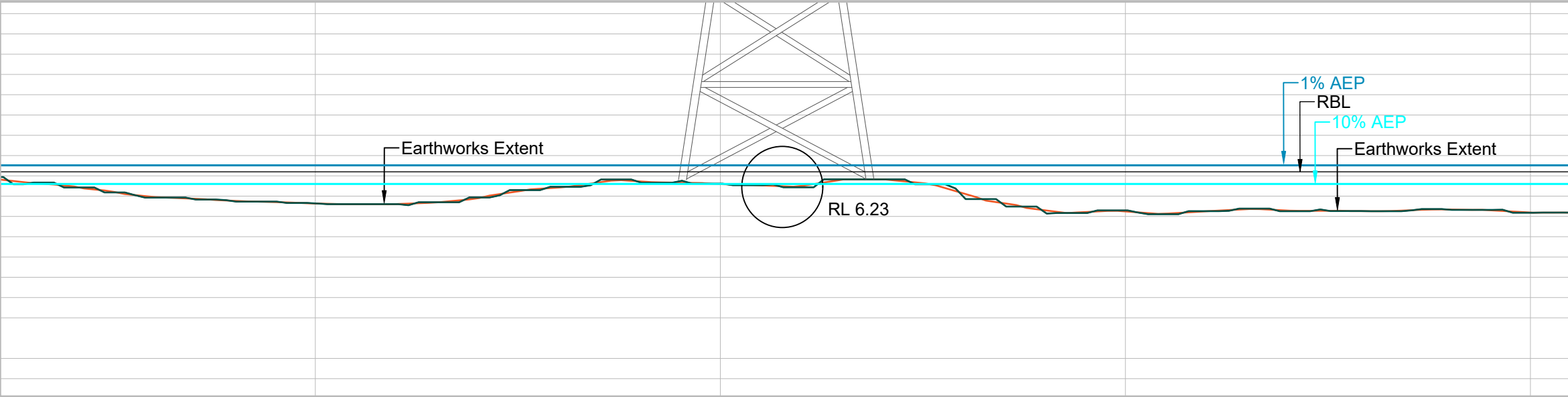
Appendix 1

Drawings 2911-P0-100, 055 & 056-Rev A – Transpower Coordination Plans;
Drawings 2911-P0-100, 055 & 056-Rev B - Transpower Coordination Plans – revised plans;
2911-12m-Setback-Figure-Set
Drawing 2911-S1-001-A – Topographical survey of towers 3 & 4



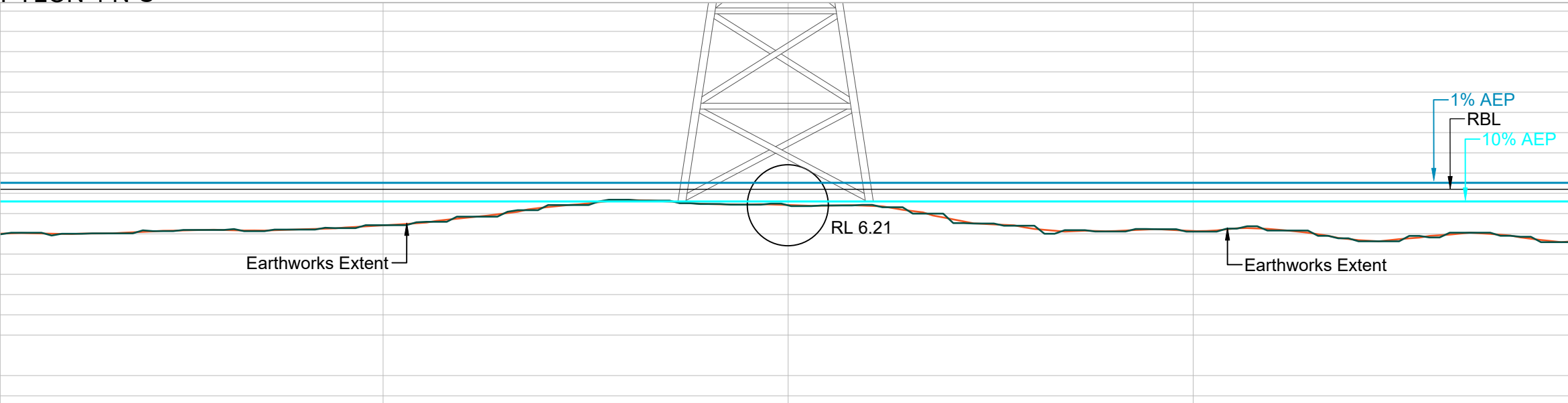
- NOTES**
1. Plan is in terms of NZGD2000 (Whanganui Circuit).
 2. Areas and dimensions are subject to cadastral survey.
 3. Grids are 10m horizontal & 0.5m Vertical increments
 4. Pylon locations are indicative only.

PYLON 3 N-S



- KEY**
- PROPOSED GROUND PROFILE
 - EXISTING GROUND PROFILE
 - 10% AEP - 6.30m
 - 1% AEP - 6.75m
 - KCDC RECOMMENDED BUILDING LEVEL (RBL) - 6.6m
 - CABLE BLOW OUT EXTENTS - TRANSPOWER

PYLON 4 N-S



REVISION	A			ORIGINAL
-	-	JH	JJH	
SURVEYED	DESIGNED	DRAWN	CHECKED	

DATE 26/03/2026

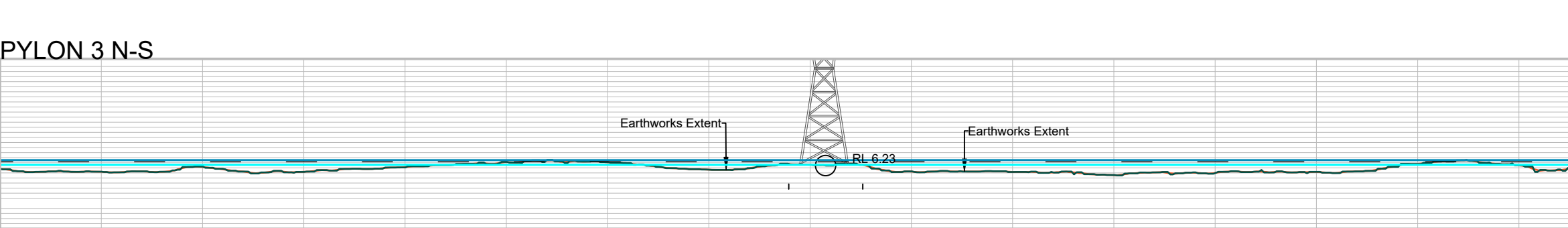
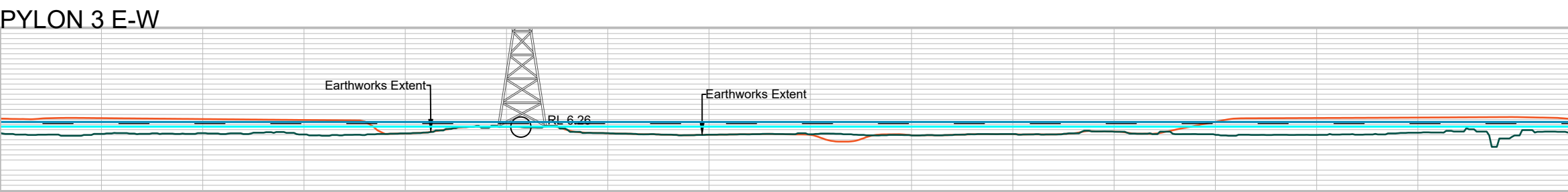
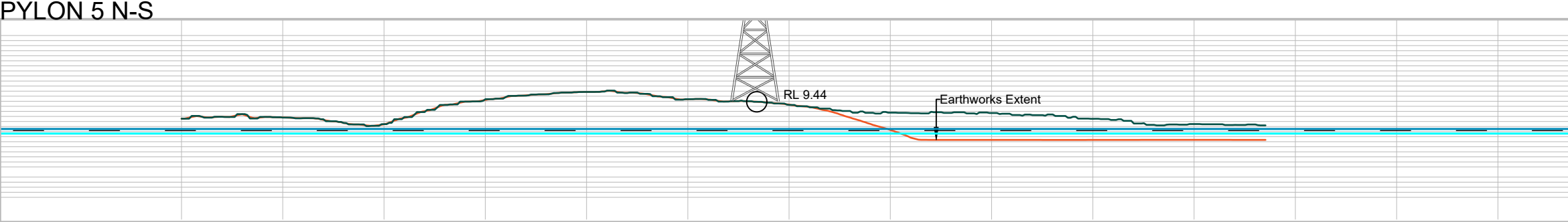
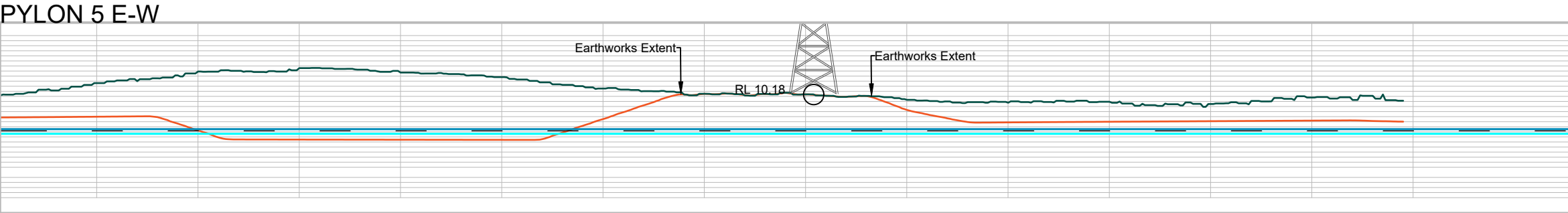
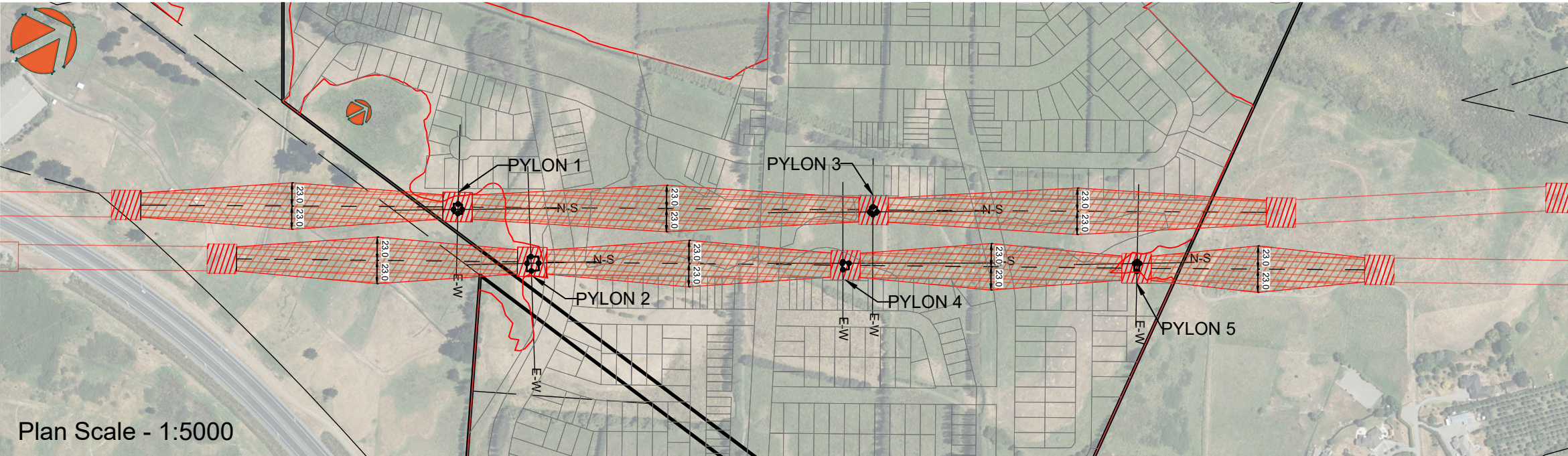
SCALE 1:500

TITLE Transpower Coordination Plans
TRANSPOWER - QUERY RESPONSE

CLIENT Waikanae North Developments Ltd

PROJECT 171 Peka Peka Rd
Peka Peka

JOB	STAGE	SHEET	REV
2911-	P0-	100	-A



- NOTES**
1. Plan is in terms of NZGD2000 (Whanganui Circuit).
 2. Areas and dimensions are subject to cadastral survey.
 3. Grids are 10m horizontal & 0.5m Vertical increments
 4. Pylon locations are indicative only.

KEY

— PROPOSED GROUND PROFILE
— EXISTING GROUND PROFILE

REVISION	A	ORIGINAL	
-	-	JH	JJH
SURVEYED	DESIGNED	DRAWN	CHECKED

DATE **07/11/2025**

SCALE **1:500**

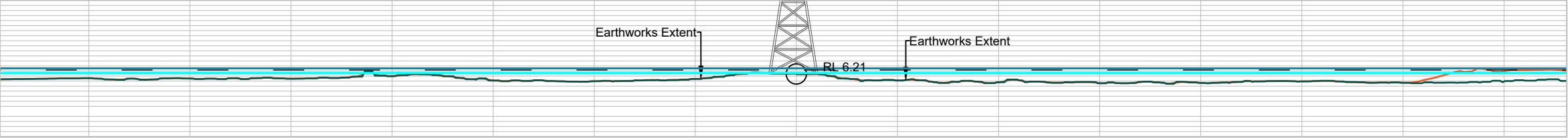
TITLE **Transpower Coordination Plans**
PYLON CROSS SECTION (1 OF 2)

CLIENT **Waikanae North Developments Ltd**

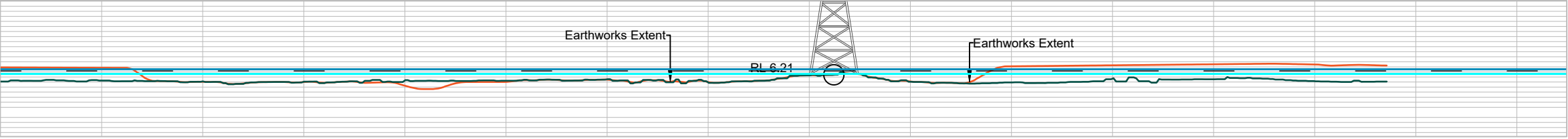
PROJECT **171 Peka Peka Rd**
Peka Peka

JOB	STAGE	SHEET	REV
2911-	P0-055	-A	

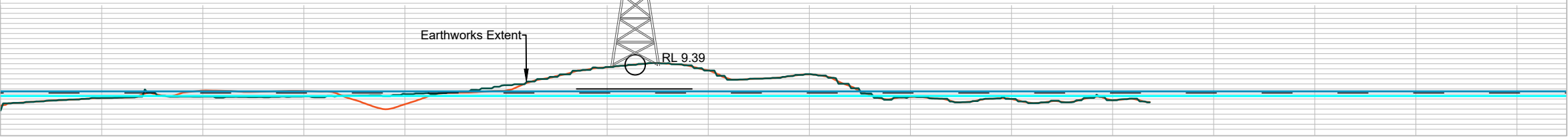
PYLON 4 N-S



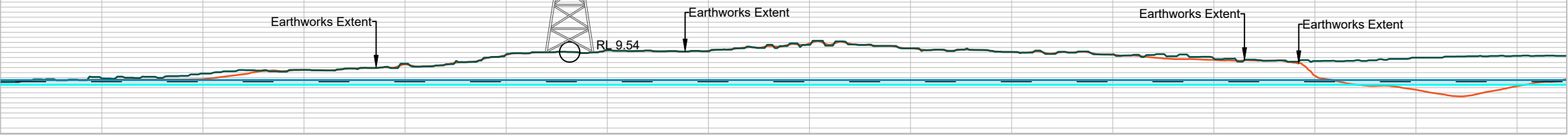
PYLON 4 E-W



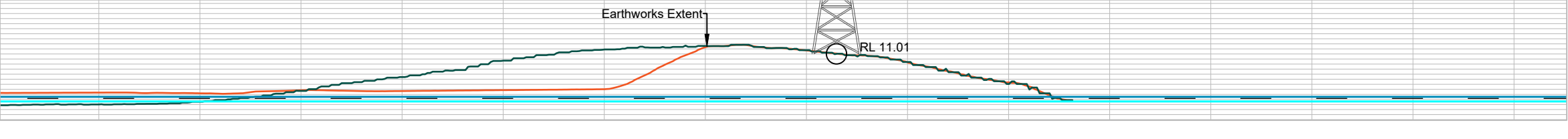
PYLON 2 N-S



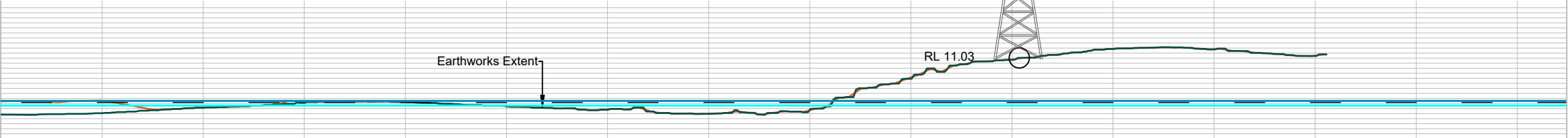
PYLON 2 E-W



PYLON 1 E-W



PYLON 1 N-S



- NOTES
1. Plan is in terms of NZGD2000 (Whanganui Circuit).
 2. Areas and dimensions are subject to cadastral survey.
 3. Grids are 10m horizontal & 0.5m Vertical increments
 4. Pylon locations are indicative only.

KEY

PROPOSED GROUND PROFILE
EXISTING GROUND PROFILE

REVISION	A	ORIGINAL	
-	-	JH	JJH
SURVEYED	DESIGNED	DRAWN	CHECKED

DATE 07/11/2025

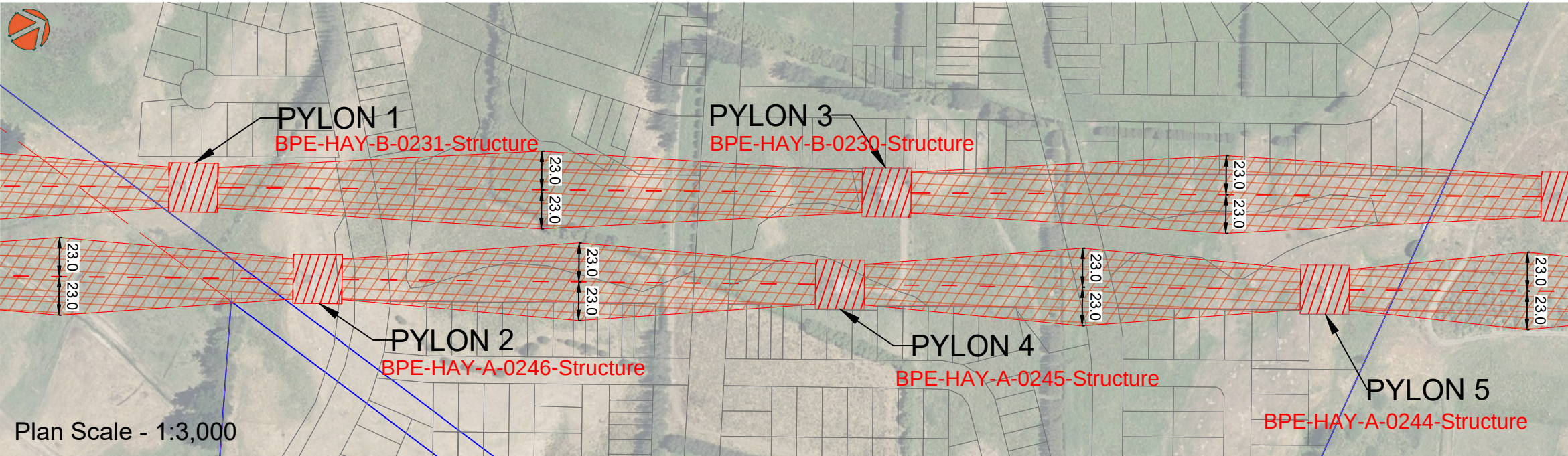
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TITLE Transpower Coordination Plans
PYLON CROSS SECTION (2 OF 2)

CLIENT Waikanae North Developments Ltd

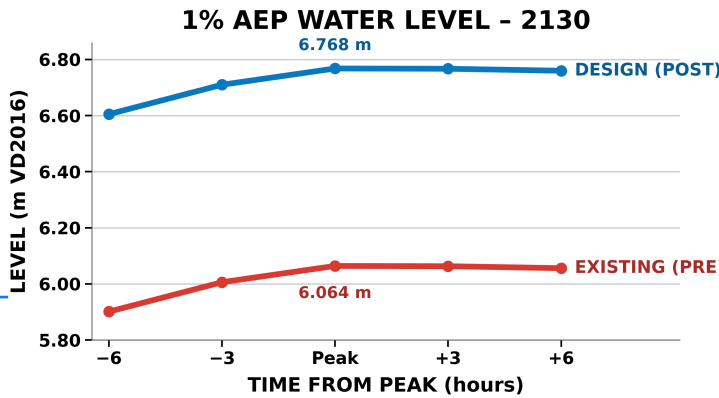
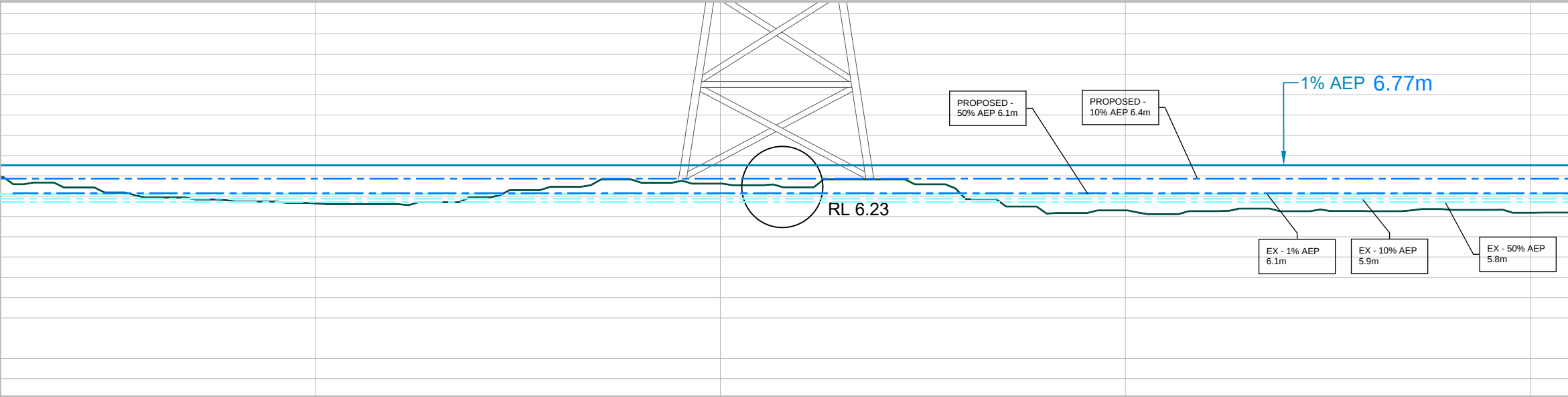
PROJECT 171 Peka Peka Rd
Peka Peka

JOB	STAGE	SHEET	REV
2911-	P0-	056	-A



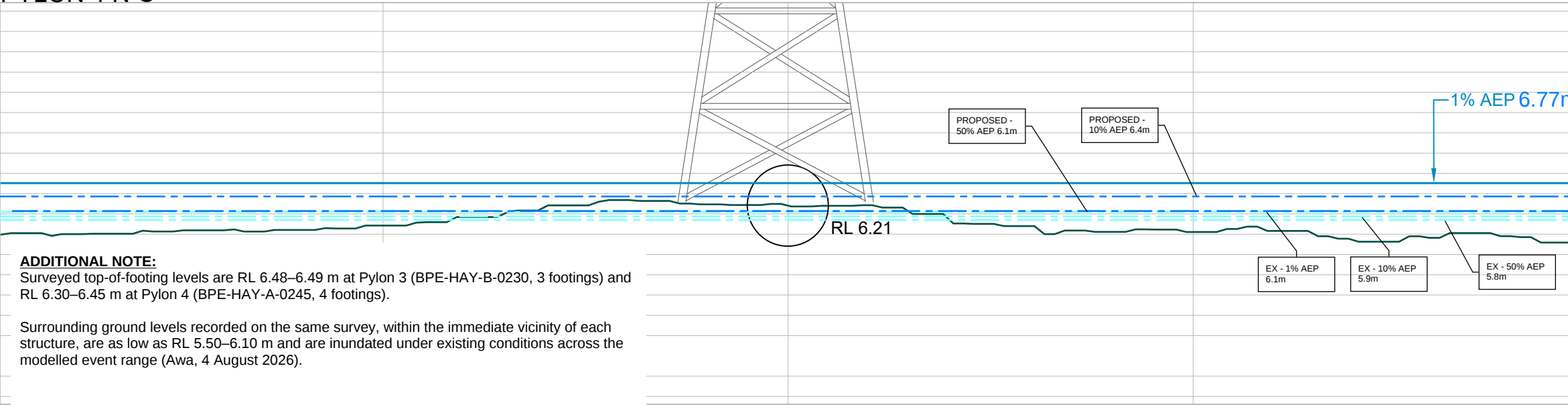
- NOTES**
1. Plan is in terms of NZGD2000 (Whanganui Circuit) and NZVD2016
 2. Areas and dimensions are subject to cadastral survey.
 3. Grids are 10m horizontal & 0.5m Vertical increments
 4. Pylon locations are indicative only.

PYLON 3 N-S



- KEY**
- PROPOSED GROUND PROFILE
 - EXISTING GROUND PROFILE
 - PROPOSED 1% AEP - 6.75m

PYLON 4 N-S



ADDITIONAL NOTE:
Surveyed top-of-footing levels are RL 6.48–6.49 m at Pylon 3 (BPE-HAY-B-0230, 3 footings) and RL 6.30–6.45 m at Pylon 4 (BPE-HAY-A-0245, 4 footings).

Surrounding ground levels recorded on the same survey, within the immediate vicinity of each structure, are as low as RL 5.50–6.10 m and are inundated under existing conditions across the modelled event range (Awa, 4 August 2026).

REVISION	A	ORIGINAL	
-	-	JH	JJH
SURVEYED	DESIGNED	DRAWN	CHECKED

DATE 04/08/2026

SCALE 1:500

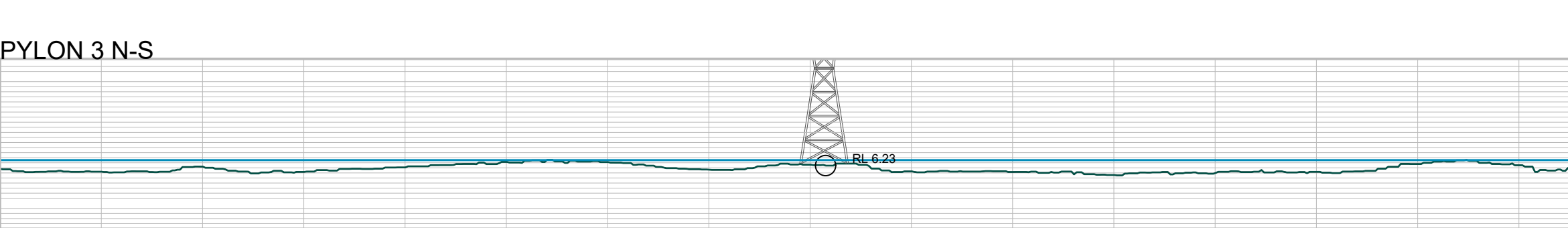
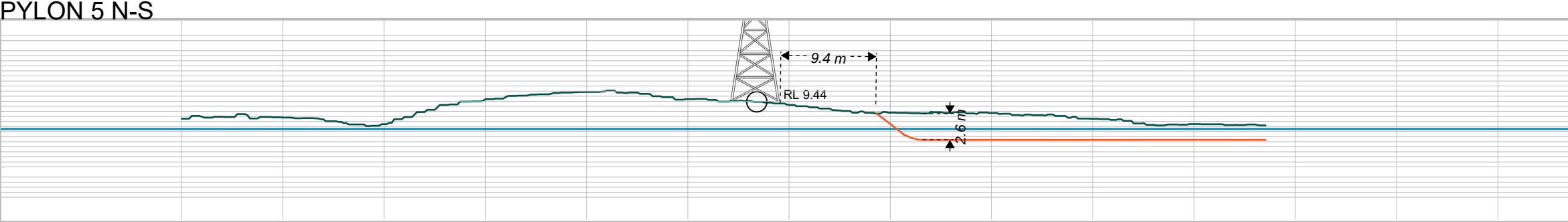
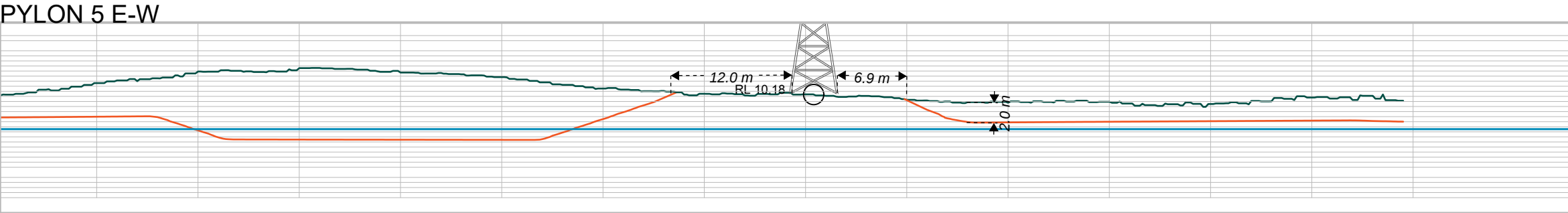
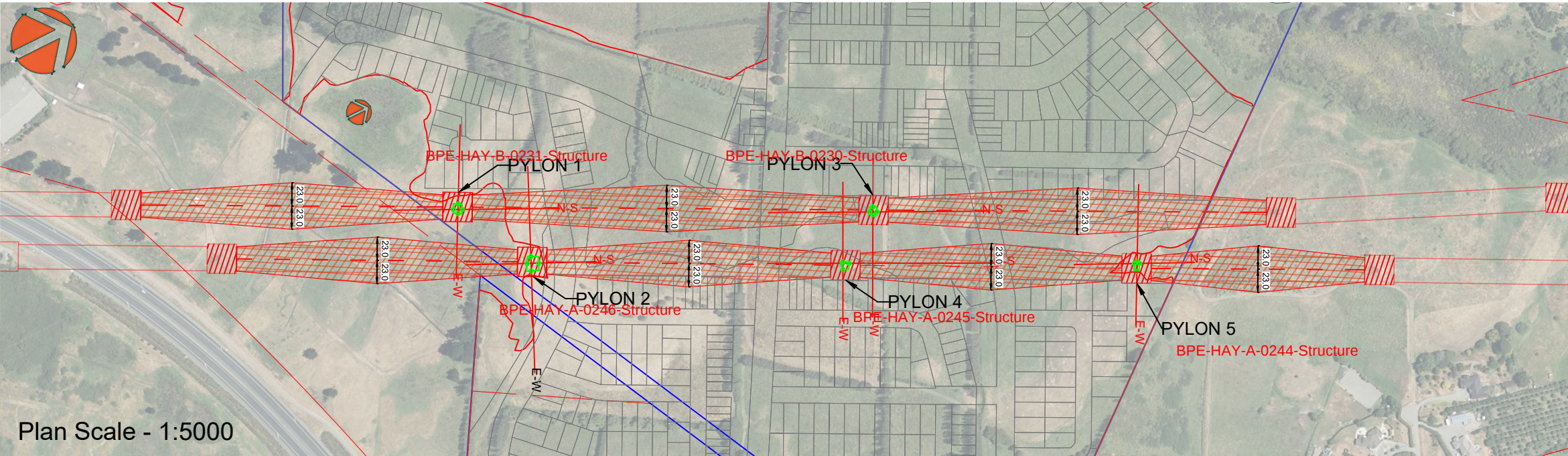
TITLE **Transpower Coordination Plans**
TRANSPower - S53 QUERY RESPONSE

CLIENT **Waikanae North Developments Ltd**

PROJECT **171 Peka Peka Rd**

Peka Peka

JOB STAGE SHEET REV
2911- P0-100 -B



- NOTES**
1. Plan is in terms of NZGD2000 (Whanganui Circuit) and NZVD 2016.
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Section 2.2.3 of NZECP34:2001

Specifically, no excavation shall:

(a) exceed a depth greater than 300mm within 6 metres of the outer edge of the visible foundations of the tower; or

(b) exceed a depth greater than 3 metres between 6 metres and 12 metres of the outer edge of the visible foundation of the tower; or

(c) create an unstable batter.

KEY

- PROPOSED GROUND PROFILE
- EXISTING GROUND PROFILE
- 1% AEP - 6.75m

REVISION	B	S53 RESPONSE	
-	-	JH	JJH
SURVEYED	DESIGNED	DRAWN	CHECKED

DATE **04/08/2026**

SCALE **1:500**

TITLE **Transpower Coordination Plans**
PYLON CROSS SECTION (1 OF 2)

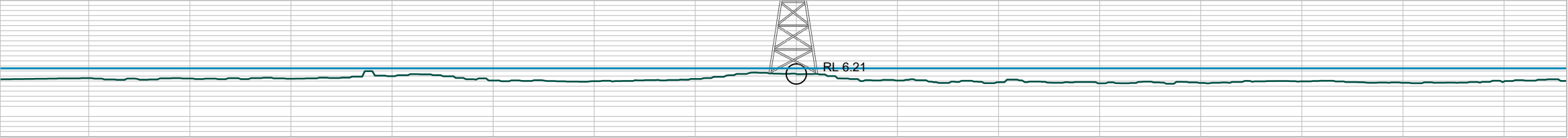
CLIENT **Waikanae North Developments Ltd**

PROJECT **171 Peka Peka Rd**
Peka Peka

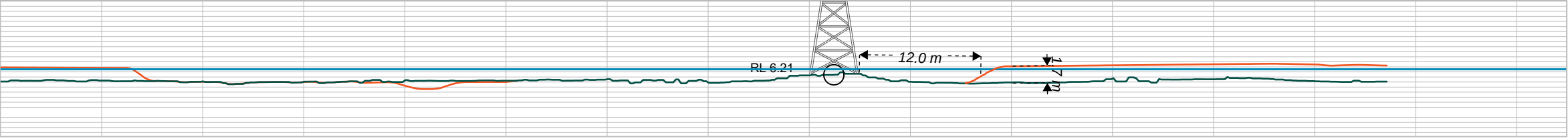
JOB STAGE SHEET REV

2911- P0-055 -B

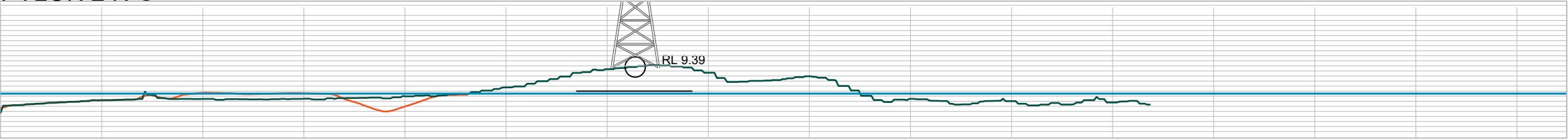
PYLON 4 N-S



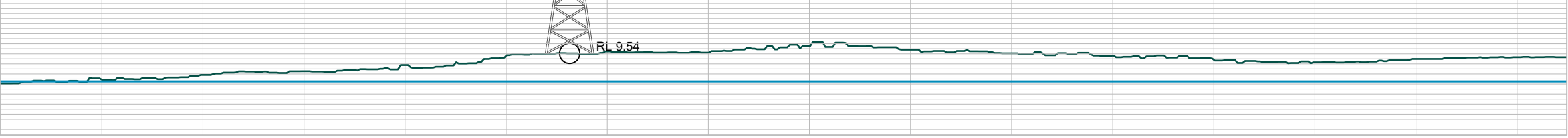
PYLON 4 E-W



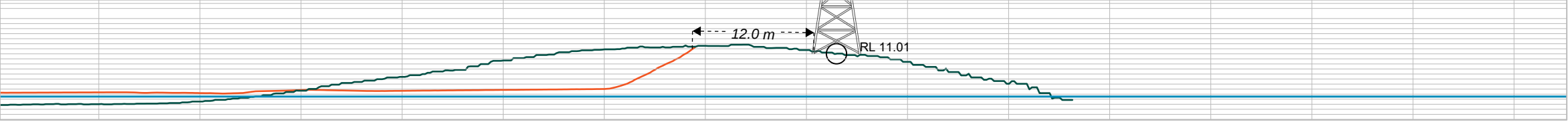
PYLON 2 N-S



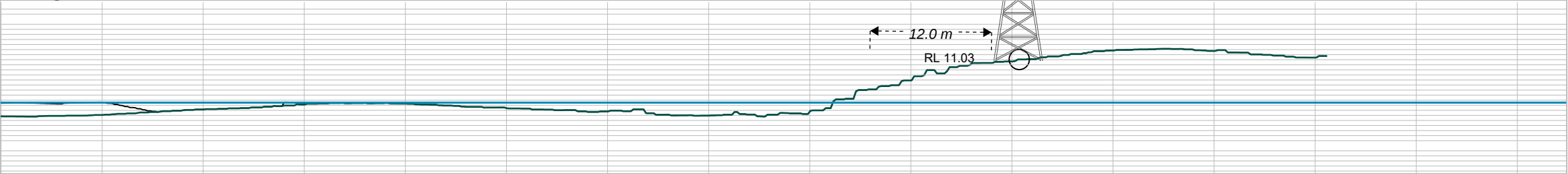
PYLON 2 E-W



PYLON 1 E-W



PYLON 1 N-S



NOTES

- Plan is in terms of NZGD2000 (Whanganui Circuit) and NZVD 2016.
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- Grids are 10m horizontal & 0.5m Vertical increments
- Pylon locations are indicative only.

Section 2.2.3 of NZECP34:2001

Specifically, no excavation shall:

(a) exceed a depth greater than 300mm within 6 metres of the outer edge of the visible foundations of the tower; or

(b) exceed a depth greater than 3 metres between 6 metres and 12 metres of the outer edge of the visible foundation of the tower; or

(c) create an unstable batter.

KEY

- PROPOSED GROUND PROFILE
- EXISTING GROUND PROFILE
- 1% AEP - 6.75m

REVISION	B	S53 RESPONSE	
-	-	JH	JJH
SURVEYED	DESIGNED	DRAWN	CHECKED

DATE04/08/2026

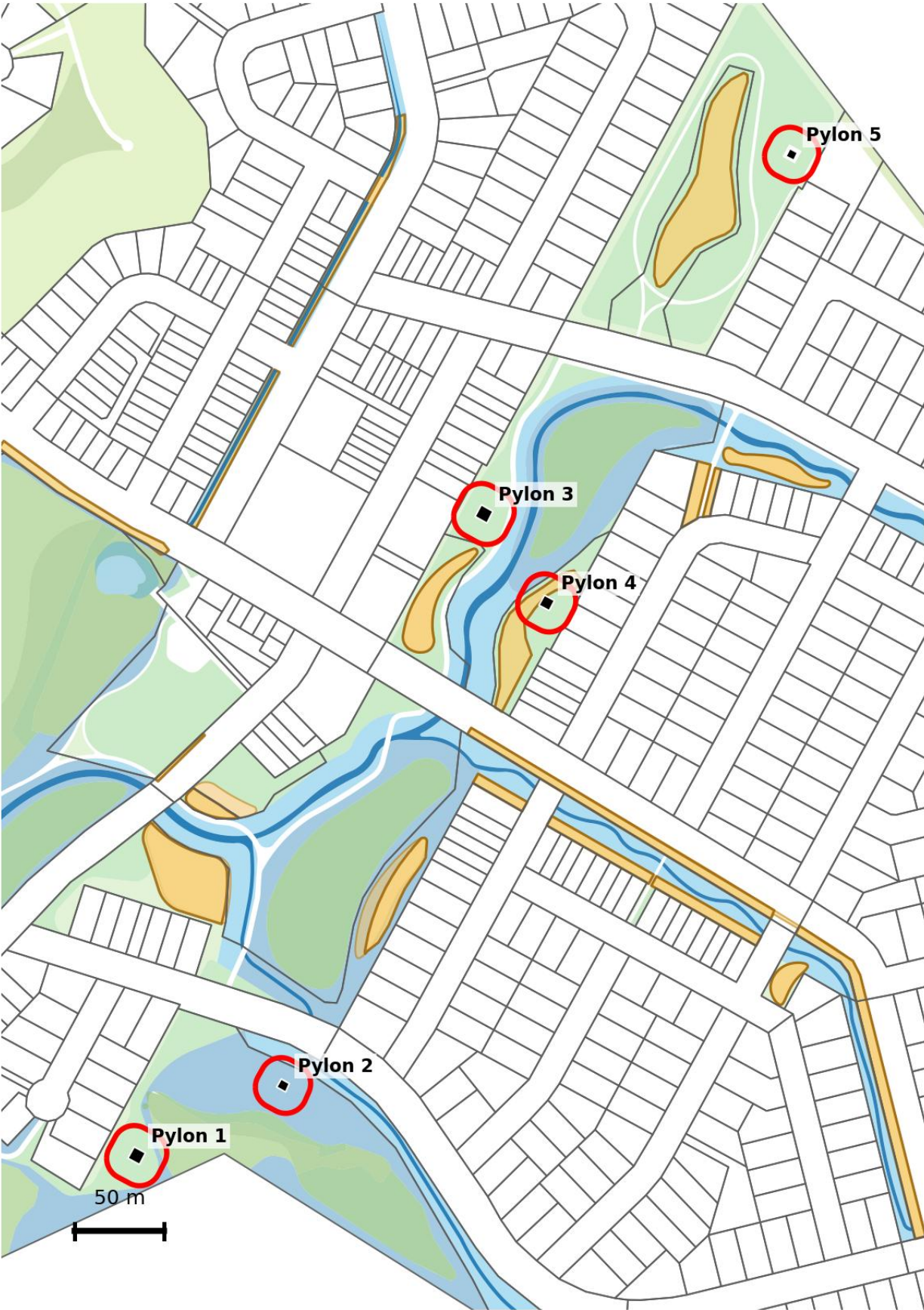
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TITLETranspower Coordination Plans
PYLON CROSS SECTION (2 OF 2)

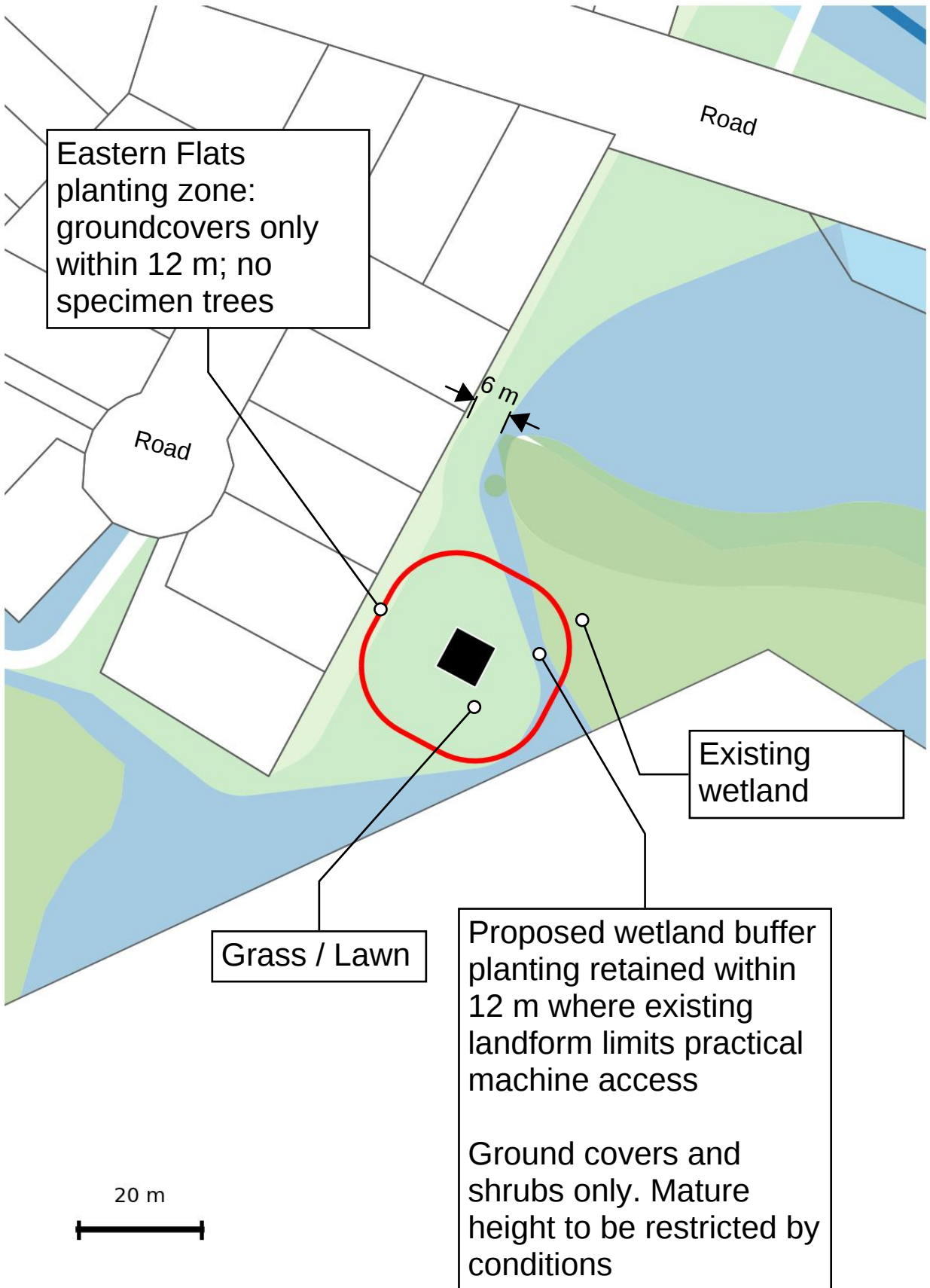
CLIENTWaikanae North Developments Ltd

PROJECT171 Peka Peka Rd
Peka Peka

12 m Tower Buffers - Scheme Boundaries and SW Water



Pylon 1 - BPE-HAY-B-0231



Pylon 2 - BPE-HAY-A-0246

Amend landscape plan:

provide grassed 12 m clearance/access area around pylon in place of wetland and drain buffer planting

Road

Proposed drain buffer planting

6 m

Grass / Lawn

10 m

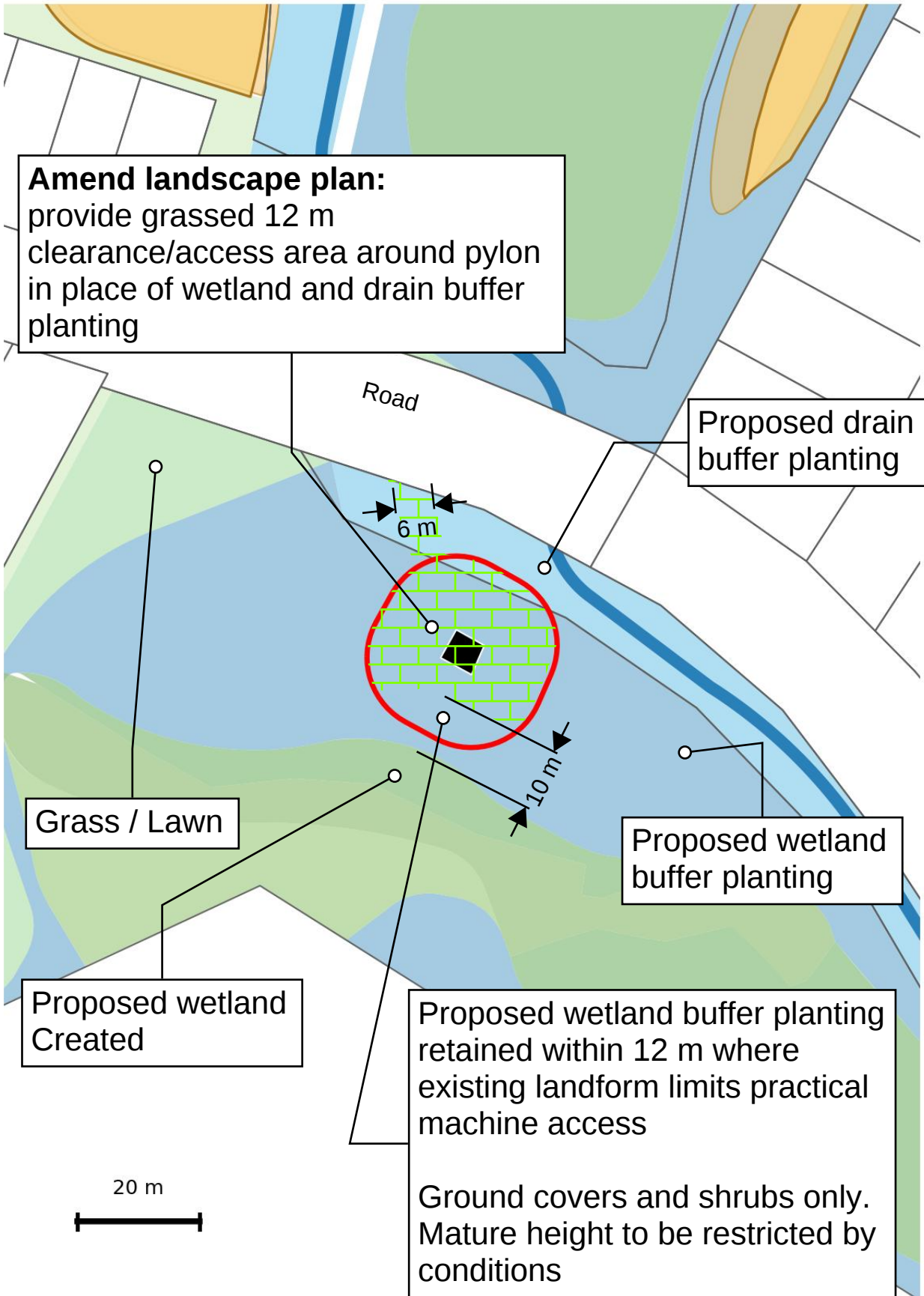
Proposed wetland buffer planting

Proposed wetland Created

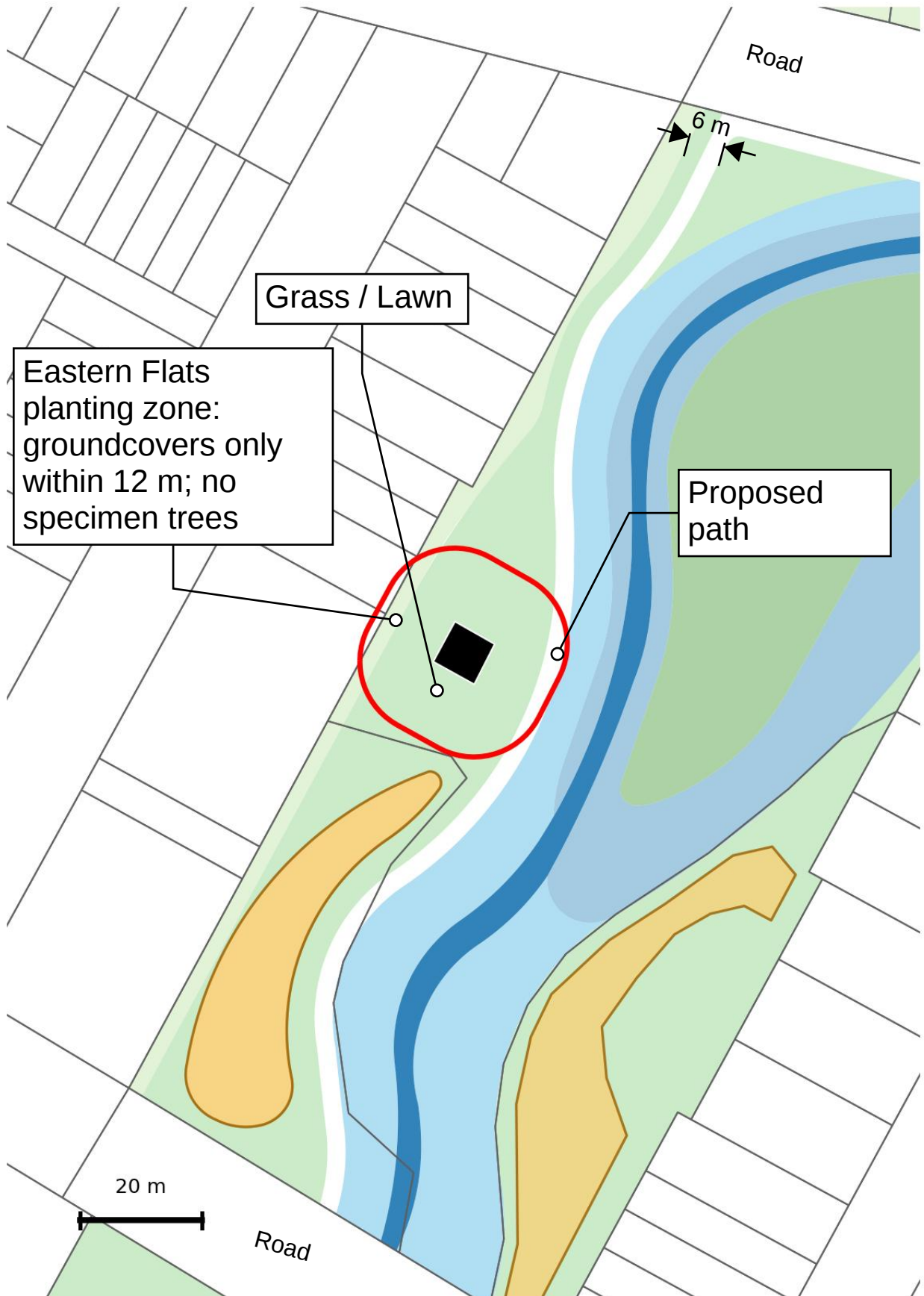
Proposed wetland buffer planting retained within 12 m where existing landform limits practical machine access

Ground covers and shrubs only. Mature height to be restricted by conditions

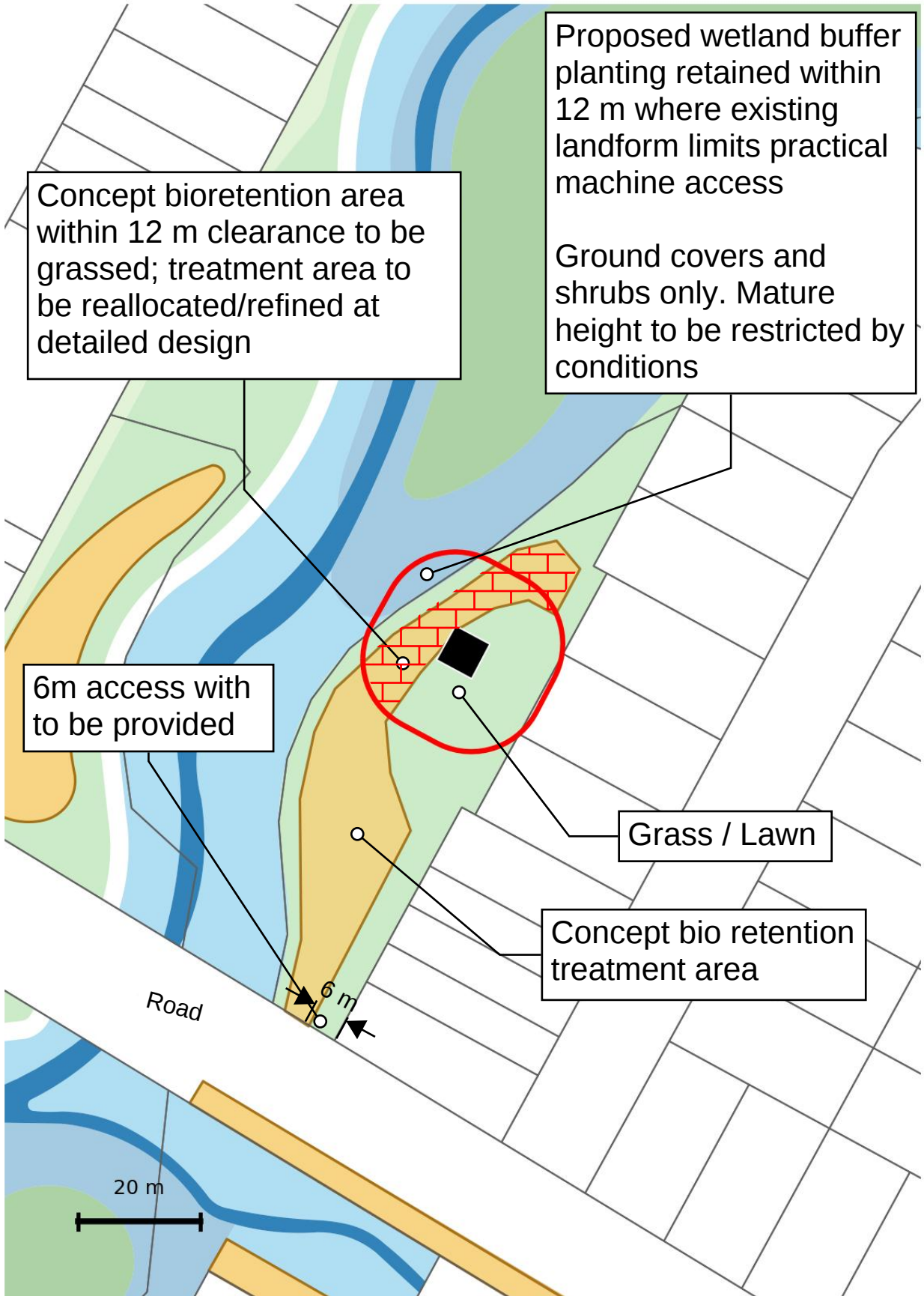
20 m



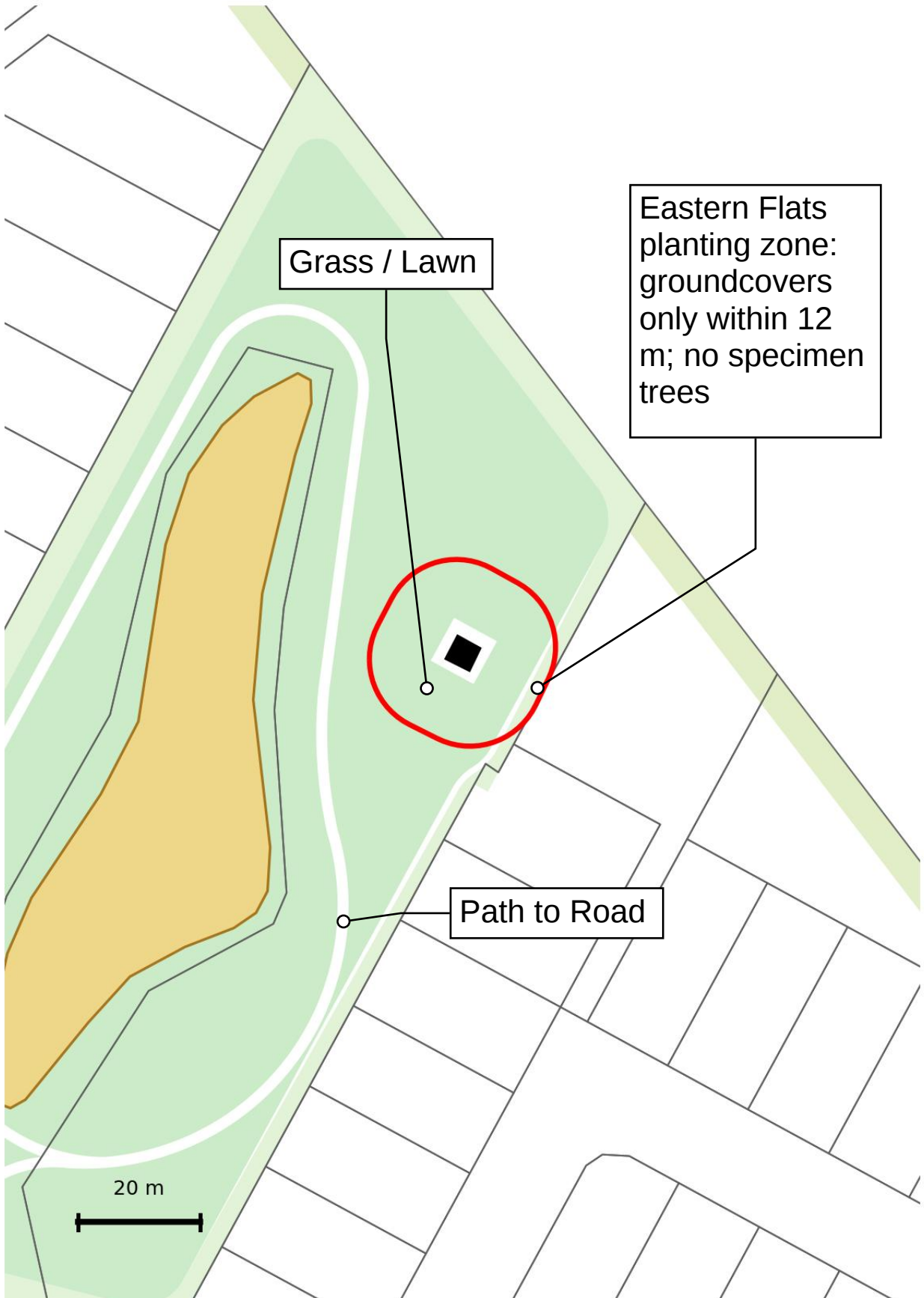
Pylon 3 - BPE-HAY-B-0230

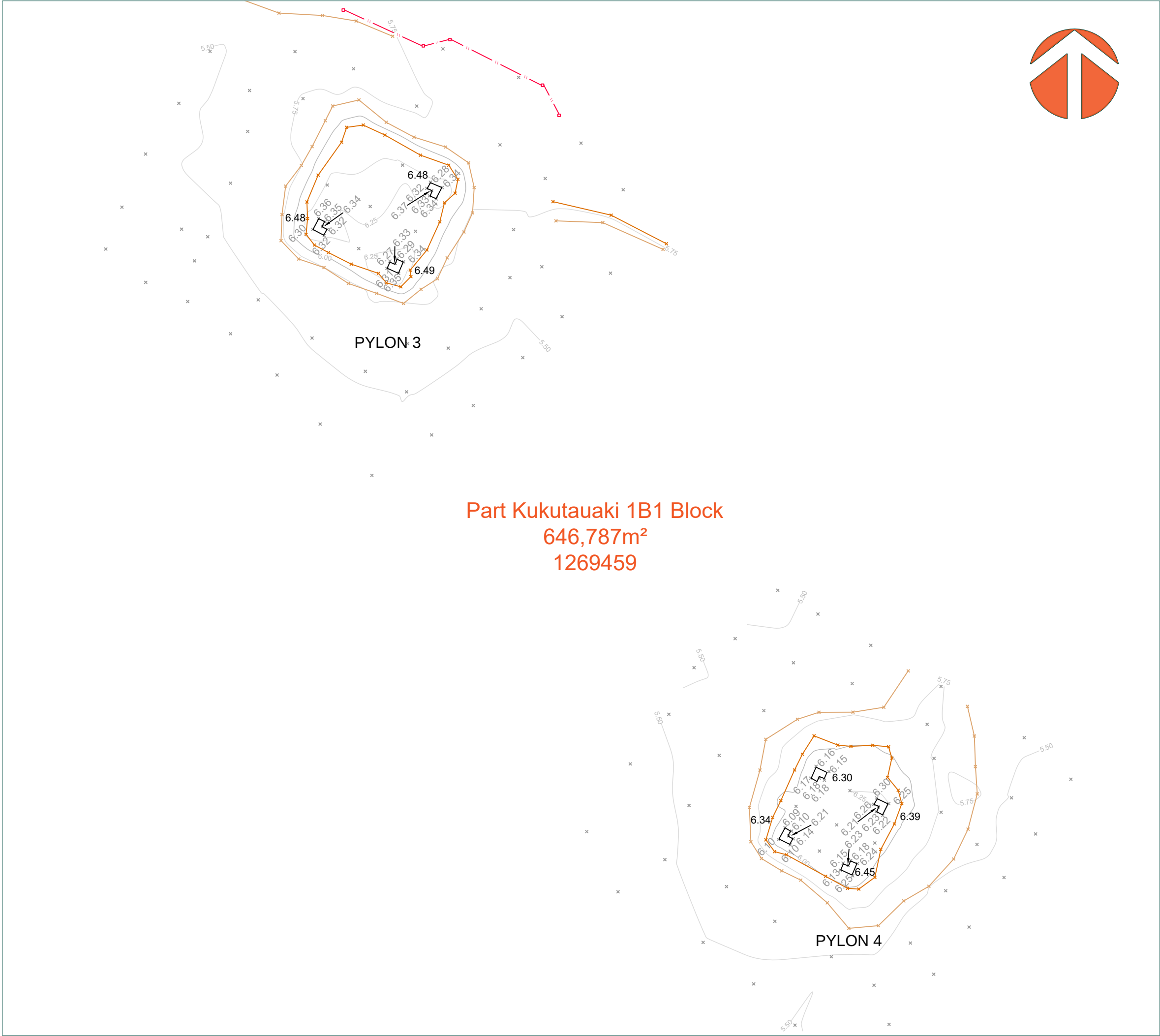


Pylon 4 - BPE-HAY-A-0245



Pylon 5 - BPE-HAY-A-0244





- NOTES**
- Plan is in terms of New Zealand Geodetic Datum 2000 Wanganui Circuit.
 - Levels are in terms of New Zealand Vertical Datum 2016 (NZVD 2016).
 - Not all easements, covenants, registered interests, or encumbrances on the property may be represented
 - Research of the record of title is recommended to confirm these.
 - Any or all areas of contaminated land, buried material, historic slips or land instability have not been identified. Specialist advice should be sought to identify such features.
 - Post observations were observed at Top of Post not at ground level.
 - Black labels show the average top-of-concrete level calculated from observations taken on each footing.
 - Grey labels show the observed surrounding ground levels.
 - Contours are electronic derived at 0.25m intervals but may not represent true ground level.
 - Do not scale from this plan.

- KEY**
- Centre Line of Fence
 - Top of Bank
 - Bottom of Bank
 - Post
 - Spot Height
 - Top Edge of Concrete Footing

TITLE	Topographic Survey
	Part Kukutauaki 1B1 Block
CLIENT	Waikanae North Developments Limited
	-
PROJECT	171 Peka Peka Rd
	Waikanae
SURVEYED BY	KV
DESIGNED BY	-
DRAWN BY	KV
APPROVED BY	PT
JOB	2911
STAGE	S1
REVISION	A
REVISION DETAILS	Original issue
DATE	04/08/2026
SCALE @A3	1:300

SHEET

2911-S1-001-A