

Your Comment on The Point Solar Farm (Far North Solar Farms)

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.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Transpower New Zealand Limited		
First name	Sarah		
Last name	Silk		
Postal address	Waikoukou 22 Boulcott Street PO Box 1021 Wellington 6011		
Home phone / Mobile phone	[REDACTED]	Work phone	[REDACTED]
Email (<i>a valid email address enables us to communicate efficiently with you</i>)	[REDACTED]		

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

Background

- 1.1 Transpower New Zealand Limited (Transpower) has been invited to comment on The Point Solar Farm 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 670 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 As shown on Transpower's 'Asset Map' in Appendix A, the Benmore to Islington A 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 operates a Queue Management Framework for managing investigations into generation connections. Transpower and the Applicant have signed a Transpower Works Agreement, and the Project has entered the delivery stage where the detailed design will be prepared.
- 2.4 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 transmission line do not adversely impact on Transpower's ability to operate and maintain these nationally significant assets, and that appropriate conditions are imposed on any consents granted. Transpower request the opportunity to review any refinements to the discharge conditions relating to the GIP substation.

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

3.5 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.

3.6 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.

3.7 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.

3.8 The National Grid Yard (NGY) is a 12-metre setback either side of the centreline of a National Grid transmission line, 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

3.9 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 National Grid support structures. 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 include the construction of physical infrastructure and earthworks, (inclusive of those for access tracks and landscaping). Transpower considers that the Applicant's proposed conditions (Appendix 12 of the Applicant's response to RFI 1), along with Transpower's requested amendments, will be sufficient to address these potential impacts. The requested changes/additions made by Transpower are outlined in Table B1 in Appendix B and discussed below in more detail.

Setback from National Grid Assets

- 4.2 The BEN-ISL-A National Grid transmission line traverses directly through the centre of the site in a north to south direction, with this portion of the site subject to the NGY. This line is supported by multiple support structures (BEN-ISL-A0079 - BEN-ISL-A0088).
- 4.3 Transpower seeks to keep the NGY free of activities which may directly or indirectly impact the National Grid, and compromise its operation, maintenance or upgrading. Based on the site layout plan (Appendix H of the Substantive Application), the solar panels will be set back at least 12 metres from the National Grid transmission line, including its support structures.
- 4.4 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.

Access to the National Grid

- 4.5 Transpower has a right to access its existing assets under section 23 of the Electricity Act 1992. Accordingly, any future buildings, structures (including fencing), or vegetation planting must be located to ensure vehicle access is maintained to the National Grid transmission lines, including support structures, for maintenance at all reasonable times and emergency works at all times. Condition 50 satisfies this requirement at a general level, with the amendments proposed to correct the transmission line reference. Comment on specific access related matters is provided below.
- 4.6 The plant road (main access roads through the site) shown on the Site Layout Plans (Appendix H of the Substantive Application) is shown as 4 metres in width. Transpower requires internal accessways that provide access to the National Grid assets to have a clear physical space 6 metres in width to allow for access by large mobile plant (such as a crane), as required for National Grid support structure operation and maintenance activities. An accessway with 4 metre formation width is acceptable provided there is at least 1 metre either side of the formation width to provide a physical width of 6 metres.
- 4.7 In relation to the extent of the site serviced by the plant road, the road extends the majority of the way down the National Grid Corridor, as shown on the Site Layout Plans. However, it does not extend through to National Grid support structure BEN-ISL-A0079, located near the eastern site boundary in the lower half of the site. This will restrict Transpower's ability to access to this structure, particularly given proposed planting is shown as adjoining all sides of the structure with no setback or corridor for access provision. Transpower requests the plant road is extended all the way through to National Grid support structure BEN-ISL-A0079 to enable access to the structure to be gained through the site, and the Site Layout Plan is updated in this regard.
- 4.8 The Site Layout Plans (Appendix H of the Substantive Application) show various fencing arrangements extending through the National Grid Corridor (including security fencing, internal and external stock fencing), which has the potential to impede Transpower's access along this corridor. Transpower require gates to be installed in this fencing where it bisects the National Grid corridor, in order to provide access through the length of the corridor and to any assets located outside the fencing. Gates providing access to National Grid assets, must be at least 6 metres wide to allow access for large mobile plant.
- 4.9 Additionally, Transpower does not support the installation of long lengths of conductive fencing parallel to

transmission lines for electrical safety reasons. Transpower requests that such fencing is designed to be non-conductive or appropriately designed to be well-earthed, such as including timber section breaks in the fence. In accordance with Section 2.3.3 of NZECP fencing in proximity to towers is made of non-conductive (non-metallic) materials.

- 4.10 Conditions 50A – 50C have been included in Table B1 in Appendix B to reflect Transpower’s requirements around the physical provision of access to the National Grid assets.

Vegetation near the National Grid

- 4.11 Vegetation is proposed around the site boundary to screen the proposed solar from the surrounding environment. Proposed Condition 53 limits the height of vegetation within the NGY to 2 metres in height at full maturity. Transpower notes that Appendix 5 (Landscape and Visual Assessment) and Appendix 11 (Management of Effects Conditions) of the applicant’s response to Request For Information 1, states that screening of the proposed solar farm by vegetation at a height of 3 metres is proposed as part of the proposed landscape and visual effects management measures. Transpower confirms that sufficient clearance is available beneath the BEN-ISL-A transmission line to accommodate vegetation up to 3 metres in height at full maturity. Condition 53 has been amended in this regard.
- 4.12 Vegetation planted outside of 12 metres either side of the centreline of the BEN-ISL-A transmission line must be setback sufficiently to ensure that trees cannot fall within 4 metres of the BEN-ISL-A transmission line (refer Requested Condition 53A in Table B1 in Appendix B). The Landscape Mitigation Plant Palette (contained in Appendix F of the Substantive Application) proposes vegetation up to 18 metres in height. However, the drawings do not show the locations of the particular species shown on the Plant Palette in relation to the National Grid. Transpower request that the Landscape, Native Vegetation and Reserves Plan and Landscape Planting Plan are updated to clearly show the zone within the NGY where vegetation is restricted to 3 metres in height at maturity, along with showing the area outside the NGY where vegetation cannot fall within 4 metres of the transmission line – this should be shown by using different hatching patterns on the relevant Plans and included in the drawing legend to avoid any confusion.
- 4.13 The proposed planting is shown as being planted up to and adjoining the foundations of National Grid support structure BEN-ISL-A0079. As mentioned in Paragraph 4.7, this will restrict Transpower’s access to this structure for operation and maintenance activities. Transpower require that planting in proximity of National Grid support structures must be setback by at least 12 metres. Consent Condition 53B is requested in this regard (refer Table B1 in Appendix B).
- 4.14 Transpower request that a copy of the Landscape Management Plan is provided to Transpower for comment prior to the plan being submitted to Mackenzie District Council for certification (proposed Condition 39A as outlined in Table B1 in Appendix B).

Transpower Construction Management Plan

- 4.15 Given the proximity of the proposed works to the BEN-ISL-A National Grid transmission 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. The Applicant has proposed a Transpower Construction Management Plan (TCMP) in this regard. Transpower has proposed minor amendments to Conditions 54 and 55 to reflect the purpose of the TCMP and to ensure the TCMP is submitted to Transpower for comment. Additionally, Transpower has requested Condition 55A to require all works near the National Grid be undertaken in accordance with the TCMP. Transpower is satisfied that Conditions 54(a)-(h), with the amendments requested in Table B1 in Appendix B, are appropriate for managing construction works near the National Grid.

Transpower Grid Injection Point Substation

- 4.16 The Substantive Application proposes a connection to the National Grid via a new grid injection point (GIP) substation connecting to the BEN-ISL-A National Grid transmission line. An indicative location for the substation is shown in the Site Layout Plans provided in Appendix H of the Substantive Application.
- 4.17 Construction phase and operational stormwater discharge permits for the GIP substation are sought as

part of the Substantive Application. Proposed conditions 120 –129 outline the requirements for the implementation and maintenance of stormwater management systems. The proposed conditions are consistent with Environment Canterbury standard conditions, which Transpower request.

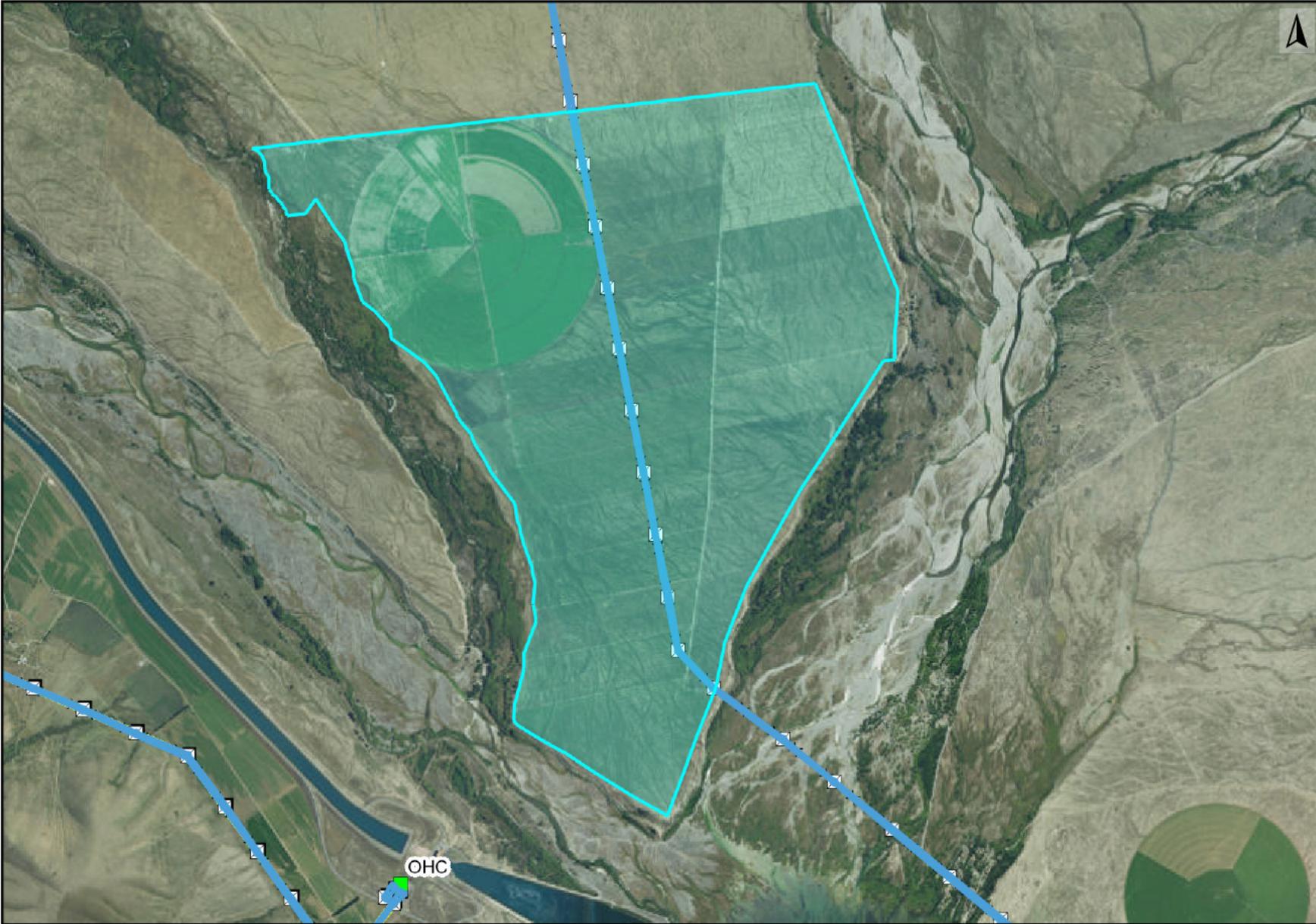
- 4.18 Transpower requests the opportunity to review any refinements to conditions that Transpower may ultimately be required to comply with should consent be granted.

Competing grid connections

- 4.19 For completeness, Transpower provides the following regarding the ability for competing projects in proximity to obtain a grid connection:

- A Transpower Works Agreement (TWA) guarantees the capacity of the generators' specific connection 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 competing projects from connecting, nor does the presence or absence of a TWA give either project an inherent advantage. As proposed connection points 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.

Appendix A – Transpower Asset Map



Legend

Maximo Assets

Site

- AC Substation

Structure

- ⊠ Single Circuit Steel Tower
- ⊠ Double Circuit Steel Tower
- Termination

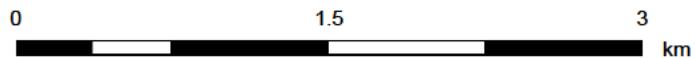
Earthwire



Span

- 220 kV

Overhead Fibre Cable



APPENDIX B – TRANSPOWER’S REQUESTED AMENDMENTS TO THE PROPOSED CONDITIONS

Table B1 – Transpower requested amendments to the Applicant’s proposed consent conditions

Transpower New Zealand Limited requests that the following amendments to the applicant’s proposed consent conditions form part of any resource consent for the Project that may be granted by the Panel. Transpower’s additions to the condition set are shown in underline and deletions are shown in ~~strike through~~. Transpower’s comments on the conditions are provided for context in the right-hand column of the conditions table.

Applicant’s Proposed Conditions and Transpower requested changes		Transpower comments
Landscaping		
37	Advice Note: Condition 30 does not apply within 12 m either side of the centreline of Transpower transmission lines (refer to Condition X).	Delete advice note as it does not relate to Condition 30. Transpower has made an amendment to Condition 53 to allow vegetation up to 3 metres in height at maturity to be planted within the NGY. The LMP shall clearly specify the heights of vegetation permitted near the National Grid.
<u>39A</u>	<u>The Consent Holder must submit the LMP to Transpower NZ Ltd for comment in relation to planting proposed near the BEN-ISL-A National Grid transmission lines and support structures, at least 20 working days before it submits the LMP to Mackenzie District Council for certification.</u> <u>Advice note: planting near the BEN-ISL-A National Grid transmission lines and support structures shall comply with Conditions 53, 53A and 53B.</u>	New condition that requires the LMP to be provided to Transpower for comment in relation to the planting proposed near the National Grid assets. It is noted that the draft plans do not specify height limits for planting in, or near the NGY, and planting currently proposed around National Grid support structure BEN-ISL-A0079 will impede access to this structure.
Access to the National Grid		
<u>50</u>	All buildings, structures (<u>including fences</u>) and vegetation must be located to ensure vehicle access is maintained to the MST UHT A <u>Benmore to Islington A (BEN-ISL-A)</u> National Grid transmission lines, and support structures, for maintenance at all reasonable times, and emergency works at all times.	Amendments to refer to the correct transmission line traversing the site and ensure fences are included in the definition of structure.
<u>50A</u>	<u>All internal accessways which provide access to the National Grid must be at least 6 m in physical width (this can comprise a 4 metre wide access track with at least 1 metre of physical space available either side of the track).</u>	New conditions to reflect Transpower’s requirements for access to the National Grid support structures and transmission lines.
<u>50B</u>	<u>Gates within the site that provide access to the Benmore to Islington A (BEN-ISL-A) National Grid transmission lines, and support structures, must be at least 6 metres in width to allow access for mobile plant.</u>	

Applicant's Proposed Conditions and Transpower requested changes	Transpower comments
<p>50C <u>Prior to the construction of any site fencing the Consent Holder must submit a fencing arrangement plan to Mackenzie District Council (with a copy provided to Transpower). The plan must demonstrate how the fencing will provide access through the National Grid Corridor and will comply with the requirements of New Zealand Code of Practice for Electrical Safe Distances (NZECP34:2001).</u></p>	
<p>Machinery, mobile plant and vehicles operating near the National Grid</p>	
<p>51 All machinery, <u>vehicles</u> and mobile plant operated in associated with the works shall <u>must maintain a minimum clearance distance of 4 metres from the live overhead conductors (wires) of Transpower's National Grid transmission lines at all times to avoid the potential of machinery striking the lines. This includes any loads being lifted or transported underneath the transmission lines.</u></p>	<p>Amendments for clarity and to ensure vehicles and any loads being lifted or transported underneath the transmission lines also comply with NZECP34:2001 requirements.</p>
<p>52 <u>To ensure safe separation distances to the conductors (wires) of the National Grid transmission lines are maintained, all machinery, mobile plant and vehicles operating within 12m of the transmission lines, and traversing beneath the lines, must be limited to a maximum reach height of 2.1m. This includes any loads being lifted or transported underneath the line.</u></p>	<p>Transpower requests the deletion of this condition as Condition 51 reflects the minimum clearance distance required to comply with NZECP34:2001 requirements. In the absence of the Applicant commissioning a NZECP34:2001 clearance assessment it is unclear how the mobile plant height referred to in the condition was calculated.</p>
<p>Vegetation near the National Grid</p>	
<p>53 Any proposed new trees or shrubs <u>vegetation</u> within 12m either side of the centreline of Transpower's the <u>BEN-ISL-A National Grid transmission lines must not exceed 23m in height at full maturity and must comply with the Electricity (Hazards from Trees) Regulations 2003, or any subsequent revision of the regulations.</u></p>	<p>Amendments for clarity and to require that vegetation planted within the NGY does not exceed a maximum height of 3 metres at maturity.</p>
<p>53A <u>Any vegetation outside of 12 metres either side of the centreline of the BEN-ISL-A National Grid transmission lines must be set back sufficiently to ensure the tree cannot fall within 4 metres of the BEN-ISL-A National Grid transmission line.</u></p>	<p>New condition to manage the height of vegetation planted outside of the NGY but near the National Grid transmission lines.</p>
<p>53B <u>Any proposed new trees or vegetation must be set back from the outer edge of the visible foundation of the National Grid Support Structures by at least 12 metres.</u></p>	<p>New condition to reflect Transpower's requirements for planting in proximity to National Grid support structures to be setback from support structures by 12 metres to enable operation and maintenance activities to be undertaken.</p>

Applicant's Proposed Conditions and Transpower requested changes		Transpower comments
Transpower Construction Management Plan (TCMP)		
54	A TCMP must be prepared at least 30 working days before the commencement of physical works on Site. <u>The purpose of the TCMP is to outline the construction methods and management procedures to be implemented on site, so that works near the National Grid are undertaken safely and potential adverse effects on the National Grid assets are appropriately managed.</u> manage the effects of construction on Transpower's assets. The TCMP must include the following (but is not limited to):...-	Amendments to set out the purpose of the TCMP.
55 (a)	The TCMP required in Condition XX must be submitted to: a. Transpower NZ Ltd to review <u>for comment</u> that the TCMP <u>outlines how construction works will be undertaken to manage potential adverse effects on the National Grid assets and how</u> access to the MST-UHT A <u>BEN-ISL-A</u> National Grid transmission line and support structures <u>will be provided</u> . The Consent Holder must submit the TCMP to Transpower NZ Ltd for review <u>comment</u> at least 20 working days before it submits the TCMP to Mackenzie District Council for certification; and;	Amendments to reflect Transpower's position which is to "comment" on a CMP, as opposed to "review", and to refer to the correct transmission line traversing the site. Amendment also to broaden the scope of matters Transpower can comment on in accordance with the purpose of the plan.
<u>55A</u>	<u>All construction activities near the National Grid assets must be undertaken in accordance with the TCMP.</u>	New condition to require all works near the National Grid be undertaken in accordance with the TCMP.