



08 December 2025

Takitimu North Link – Stage 2 Fast-track Application
Environmental Protection Authority
Private Bag 63002
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Via: substantive@fasttrack.govt.nz

Tēnā koutou

Comments from Powerco on the Takitimu North Link – Stage 2

These comments are made by Powerco Limited (**Powerco**) on the proposal by NZ Transport Agency Waka Kotahi (**NZTA**) to construct a 4-lane median divided highway to replace existing State Highway 2 corridor between Te Puna and Ōmokoroa, including altering the existing designation (**TNL2**).

Introduction

Powerco owns and operates the electricity distribution infrastructure located within the western Bay of Plenty. As illustrated on the attached asset maps (Attachment A), Powerco owns and operates extensive networks within the TNL2 project area which comprise both overhead and underground electrical assets (and associated communication cables). The electrical assets passing through the area to be designated operate at either low voltages, 11kV or 33kV and are critical to the supply of electricity of Omokoroa and surrounding areas.

The Omokoroa zone substation, located at 24 Albert Lane, Whakamārama, is also located within the area to be designated for the TNL2. This property is legally described as *Allotment 380 Parish of Te Puna and Section 1 Survey Office Plan 492478*. This site is designated by Powerco under the Operative Western Bay of Plenty District Plan, reference D240 (Omokoroa Zone Substation). At present this substation supplies 5,295 Installation Control Points (**ICPs**) – each ICP represents an individual connection to our networks and includes dwellings, businesses, schools, industry and pack houses within the area. The past 20 years has seen significant growth in the area which has dramatically increased the importance of the Omokoroa zone substation.

The importance of these Powerco networks is acknowledged within the Bay of Plenty Regional Policy Statement as 'Regionally Significant Infrastructure', which contains objectives and policies to ensure such activities are protected¹.

¹ Bay of Plenty Regional Policy Statement Objective 6, Policy EI 3B, Method 3.

Comments

Powerco is neutral on the application.

Powerco's primary concern with the TNL2 relates to the continued operations of its networks. The ability to construct, operate, access and maintain its assets is critical to the supply of electricity to Omokoroa and surrounding areas. Electricity distribution infrastructure is a physical resource that forms part of the environment. The effects of the TNL2 proposal, including effects on Powerco assets, must be considered. The TNL2 project has the potential to have the following adverse effects on Powerco networks within the designated area:

- The new road alignment will go through the middle of the Omokoroa zone substation² meaning that it will have to be relocated. This will be a complex, time consuming and expensive undertaking. These effects go beyond the designated property as all associated connections with existing networks need to be connected to that new site (refer to Attachment A). It is important to note that this substation needs to operate continuously so that supply to the existing 5,295 ICPs can be maintained.
- Earthworks and / or preloading activities potentially damaging or derating underground cables.
- The potential for NZECP34 clearance breaches being caused by changes in ground level in relation to overhead lines.
- Stability of overhead assets being compromised by earthworks.
- Physical damage to assets.
- Lack of access to existing assets due to construction activities or the existence of the designation.
- Landlocking / lack of access if the existing Omokoroa substation is left in-situ.
- The sub-transmission or distribution lines / cables connected to the substation being disrupted, meaning the substation cannot be operated as intended.

Powerco acknowledges that NZTA have updated the conditions associated with the existing designation, which have been replaced with conditions CC3-CC5 (repeated below) as part of its application.

Network Utility Operations

CC3 *During the design and implementation of the Project, the Requiring Authority shall give reasonable notice and make all reasonable endeavours to consult with Network Utility Operators in relation to any part of the Project Works within the Designation that may affect their infrastructure. Where appropriate the Requiring Authority shall make all reasonable changes requested by Network Utility Operators to the relevant plans and methodologies to ensure that access, maintenance and operation of infrastructure within the Designation is not adversely affected. In the event that adverse effects on Network Utility Operations are unavoidable, the Requiring Authority shall as far as reasonably practicable, ensure that the effects are remedied or mitigated as appropriate in consultation with the Network Utility Operators. All costs associated with avoiding, remedying or*

² As shown on Drawing number 144702-00-1205, rev P

mitigating the effects on Network Utility Operators infrastructure shall be borne by the Requiring Authority.

- CC4 *Unless otherwise agreed between Powerco and the Requiring Authority, no Construction Works shall take place within 100 metres of the existing Powerco Omokoroa Zone substation (measured from the boundary of Allotment 380 Parish of Te Puna) until a new substation (built to Powerco's standards) on an alternative site has been constructed and is operational, and the existing Powerco substation has been de-energised. Subject to the Electricity Act, all costs associated with the land and easement acquisition, design, consenting, construction and commissioning of an equivalent substation, shall be borne by the Requiring Authority. The Requiring Authority shall liaise with Powerco during the design and construction of the Project to ensure that any transmission and distribution feeders (temporary and permanent) connecting to the new substation are taken into account.*
- CC5 (a) *Prior to the start of Construction Works, Network Utility Operators with existing infrastructure located within the Designation Boundary may undertake the following activities in relation to that existing infrastructure:*
- (i) Operation, maintenance and urgent repair works;*
 - (ii) Minor renewal, upgrade or temporary works to existing network utilities necessary for the on-going provision or security of supply of Network Utility Operations;*
 - (iii) Minor works such as new service connections; and*
 - (iv) The upgrade and replacement of existing network utilities in the same or similar location with the same or similar effects as the existing utility.*
- (b) *This condition shall constitute prior written consent under section 176 of the RMA.*

Powerco agrees that these conditions are necessary to address potential adverse effects on the Powerco networks and seeks that the Panel impose these conditions in full, without modification, within its decision.

Conclusion

Powerco appreciates the opportunity to provide input to this proposal. Through these comments, Powerco seeks to ensure the continued operation and access for maintenance and upgrading of its electricity network is not unduly compromised.

Powerco would appreciate the opportunity to review the draft conditions for comment – the email address below is correct.

If you have any queries or require additional information on this matter, do not hesitate to contact me.



Ngā mihi

A handwritten signature in blue ink, appearing to read "G. Scholfield".

Gary Scholfield

Senior Environmental Planner

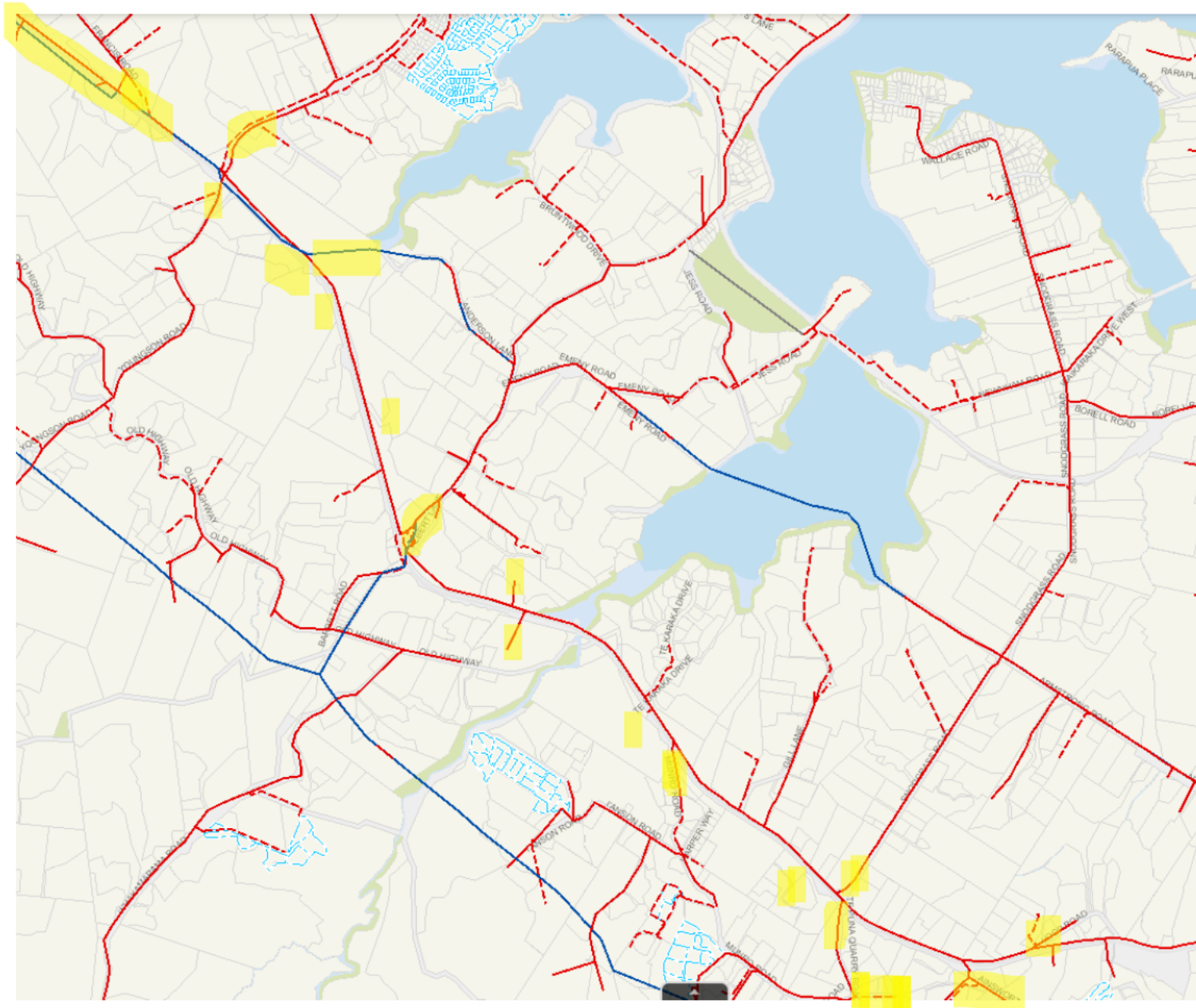
POWERCO

Address for Service: Powerco Limited
PO Box 13 075
Tauranga 3141
Attention: Gary Scholfield

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Email: planning@powerco.co.nz

Attachment A: Powerco Assets – Takitimu North Link Stage 2



KEY:

- 11 kV under ground
- 11 kV overhead
- 33kV overhead
- Approximate locations of Powerco assets within the TNL2 Designation

Powerco Assets connecting to the Omokoroa Zone Substation (24 Albert Lane)

