

Appendix One

shearer consulting

PO Box 60240
Titirangi Auckland
mob: 021 735 914
e: craig@craigshearer.co.nz

19 January 2026

National Green Steel Limited
19 Hobill Ave
Wiri

By email: vipan@nationalsteel.co.nz

Dear Vipan

RE: Minute 10 of the Expert Panel – Assessment of relevant Resource Management Act (“RMA”) statutory provisions for electricity distribution provisions.

1. Introduction

The Panel has requested information relating to the supply and distribution of electricity to the Green Steel site at Hampton Downs. You have asked me to briefly assess the relevant RMA statutory provisions relating specifically to the distribution of electricity in the Waikato district.

2. Statutory Documents

There are two Resource Management Act statutory documents relevant to the distribution of electricity. These are the National Policy Statement for Electricity Networks 2008, and the Proposed Waikato District Plan.

3. National Policy Statement for Electricity Networks 2008 (“NPS-EN”)

The NPS-EN was most recently updated in December 2025. The NPS applies to electricity network activities, which includes all electricity transmission and distribution networks and ancillary electricity network activities, including by electricity distribution network providers, such as any company that would provide electricity to the Green Steel site.

The Objective of the NPS is:

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 Electricity Network; and*
- (c) supports achievement of New Zealand’s climate change mitigation and renewable energy targets.*

There are a number of policies aimed at giving effect to the Objective. I do not traverse these policies in detail except to say they require decision-makers to recognise and provide for the national significance of the electricity network and provide for the ongoing benefits of it, and to manage the effects of electricity networks activities on the environment.

My overall assessment is that any proposal to supply electricity to the Green Steel site, by upgrading or providing a new electricity distribution network would be consistent with the provisions of the NPS-EN, provided environmental effects are appropriately managed.

4. Waikato District Plan – Operative in Part (“WDP”)

The relevant provisions in the WDP are contained in the Energy, Infrastructure and Transport section (Part 2 of the WDP). This section contains provisions (objectives, policies and rules) relevant to all infrastructure, and rules specific to electricity distribution.

In summary, the overall direction relevant to electricity distribution reflect the NPS-ED, with the most relevant objective being AINF-07 “infrastructure is provided for, and integrated with, subdivisions, use and development”.

The WDP defines “Infrastructure”, in relation to electricity as meaning:

- (d) Facilities for the generation of electricity, lines used or intended to be used to convey electricity, and support structures for lines used or intended to be used to convey electricity, excluding facilities, lines, and support structures if a person:

 - (i) Uses them in connection with the generation of electricity for the person’s use; and*
 - (ii) Does not use them to generate any electricity for supply to any other person;**

Policy AINF-P1 is as follows:

- 1) Provide for the development, operation, maintenance, repair, replacement, upgrading and removal of infrastructure throughout the district by recognising:

 - (a) Functional and operational needs;*
 - (b) Location, route and design needs and constraints;*
 - (c) Locational constraints related to the need to access suitable resources or sites;**

- (d)The benefits of infrastructure to people and communities;*
- (e)The need to quickly restore disrupted services; and*
- (f)Its role in servicing existing consented and planned development;*
- (g)The need for physical access to infrastructure.*

And policy AINF-P3 includes the following:

(1) Have regard to the benefits that infrastructure provides, including:

- (a)Enabling enhancement of the quality of life and residential standard for people and communities;*
- (b)Providing for public health and safety;*
- (c)Enabling the functioning of business and growth and development;*
- (d)Managing adverse effects on the environment;*
- (g)Providing for lifeline utility services.*

Rules

The Rules are contained in the section on Electricity Distribution (EDIS), and are set out below.

Of note is transmission lines are permitted, as are substations and associated transformers and switching stations, provided the permitted activity standards are complied with. Green Steel has received advice from two potential electricity supply companies that they are likely to be able to comply with the standards set out in the rules in Table 1 below. The standards are not onerous.

Table 1: Relevant WDP Rules relating to electricity distribution:

EDIS-R1: Below ground transmission lines		
All zones	(1) Activity status: PERMITTED Activity-specific standards: Nil.	(2) Activity status where compliance not achieved: n/a
Edis-R2: Overhead distribution lines and support structures within the GRUZ - General rural zone		
GRUZ- General rural zone	(1) Activity status: PERMITTED Activity-specific standards: (a) Overhead distribution lines and support structures that comply with the following: (i) Do not exceed a voltage up to and including 110kV; and	(2) Activity status where compliance not achieved: DIS

	<p>(ii) Do not exceed a maximum height of 25m, measured from the natural ground level immediately below the structure; or</p> <p>(iii) Do not exceed a maximum height of 30m, measured from the natural ground level immediately below the structure, for co-location of at least two operators; and</p> <p>(iv) Are not located within an Identified Area.</p>	
<p>EDIS-R3: Overhead distribution lines and support structures within road or unformed road located adjacent to the GRUZ - General rural zone</p>		
All zones	<p>(1) Activity status: PER</p> <p>Activity-specific standards:</p> <p>(a) Overhead distribution lines and support structures that comply with the following:</p> <p>(i) Do not exceed a voltage up to and including 110kV; and</p> <p>(ii) Do not exceed a maximum height of 25m, measured from the natural ground level immediately below the structure; or</p> <p>(iii) Do not exceed a maximum height of 30m, measured from the natural ground level immediately below the structure, for co-location of at least two operators; and</p> <p>(iv) Are not located within an Identified Area.</p>	<p>(2) Activity status where compliance not achieved: DIS</p>
<p>EDIS-R4-Substations and associated transformers and switching stations</p>		

All zones	<p>(1) Activity status: PERMITTED</p> <p>Activity-specific standards:</p> <p>(a) Substations and associated transformers and switching stations distributing electricity that comply with the following:</p> <p>(i) Distribute electricity at a voltage up to and including 110kV; and</p> <p>(ii) Are located within the COMZ - Commercial zone TCZ - Town centre zone, LCZ - Local centre zone, BTZ - Business Tamahere zone, TKAZ - Te Kowhai airpark zone, GIZ - General industrial zone, HIZ - Heavy industrial zone and MSRZ - Motor sport and recreation zone; and the GRUZ - General rural zone;</p> <p>(iii) Any ancillary buildings do not exceed 250m² in gross floor area;</p> <p>(iv) Are not located within an Identified Area; and</p> <p>(v) Maximum height 10m, measured from the natural ground level immediately below the structure.</p>	<p>(2) Activity status where compliance not achieved: DIS</p>
-----------	---	---

My assessment of the provision of electricity to the Green Steel Site against the above provisions is that it is likely to be consistent with the policy direction. Provision of electricity lines and associated activities are consistent with the Objective AINF-07. In terms of the policies AINF-P1 and P3, in providing the necessary infrastructure for a project with significant regional or national benefits, the development of the infrastructure has functional and operational needs, can fit within location, route and design needs and constraints, and its provisions will benefit the wider community by enabling the project to proceed. Without the infrastructure the project cannot proceed.

Electricity infrastructure will enable the functioning of business and growth and development, provide for lifeline utility service: potential network providers are confident electricity can be supplied by managing adverse effects on the environment;

Summary

The relevant rules EDIS-R1-R4 provide for all electricity supply infrastructure as a Permitted Activity, without the need for consent, provided the standards set out in the provisions are complied with. As such, the effects associated with infrastructure which meets the standards are deemed to be acceptable by the District Plan.

The standards are not particularly onerous for providers of electricity – advice is that voltage of up to 110kV lines will not need to be exceeded; there is no need to exceed 25m/30m as set out in the provisions above; they will be located in the General Rural Zone (GRUZ) and / or road reserve adjacent to the GRUZ; and they will not need to be located within an identified area (Significant Natural Area, Outstanding Natural Feature, Outstanding Natural Landscape etc). Compliance with these standards will ensure environmental effects are appropriately managed, in accordance with the WDP and the NPS-EN.

Overall, the provisions of the statutory documents are very supportive of the development of electricity network infrastructure in servicing new business initiatives and in my opinion, after reading the feedback from the two potential suppliers of electricity to Green Steel, with careful design they should be able to provide the necessary infrastructure as a permitted activity.

Yours sincerely



Craig Shearer
Principal, Shearer Consulting Limited