

## Notification determination under Clauses 5 and 5A(2) of Part 1 of Schedule 1 of the Resource Management Act 1991 – Private Plan Change request from Transpower Limited

**37 Harrison Road, 263 and 391 Quarry Road, 51 Maketu Road and 2 Kuku Road, Drury**


### Delegation

In accordance with Auckland Council Combined Chief Executive’s Delegation Register (updated May 2022), all powers, functions and duties under Schedule 1 of the Resource Management Act 1991, except for the power to approve a proposed policy statement or plan under clause 17 of Schedule 1 (this power cannot be exercised by any Council officer or Hearings Commissioner), are delegated to the relevant Tier 4 Manager.



### Kupu whakamohiotanga

#### Notification Recommendation

1. That in accordance with Clauses 5 and 5A of Part 1 of Schedule 1 to the Resource Management Act 1991, the private plan change request by Transpower Limited applying to land at 37 Harrison Road, 263 and 391 Quarry Road, 51 Maketu Road and 2 Kuku Road, Drury be processed on a limited notified basis for the following reasons:
  - a. The private plan change request is limited in scope and raises environmental issues that only directly affect the immediate environs of the land covered by the plan change request.
  - b. As a result, council is able to identify every person who will be directly affected by the proposed private plan change.
2. That in accordance with Clause 5A(3) of Part 1 of Schedule 1 to the Resource Management Act 1991, the council serves limited notice on all persons identified as being directly affected by the proposed change, being:
  - a. Mana whenua, statutory agencies and parties the requestor consulted with in the development of the plan change
  - b. Ratepayers of the subject land (refer to Figure 3 in this report).
3. That in relation to Clause 5A(6), the closing date for submissions be 20 working days after limited notification.

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Reviewed by	<p>Craig Cairncross  Team Leader, Planning Central South  Signature:    Date: 01/04/2026</p>
Approved for release	<p>Celia Davison  Manager Central South  Signature:    Date: 01/04/2026</p>

## Te take mō te pūrongo

### Purpose of this report

1. To consider whether the private plan change request by Transpower Limited to the Auckland Unitary Plan – Operative in Part ('AUP') should be publicly notified under clause 5(1)(b)(i) or limited notified under clause 5(1)(b)(ii) of Part 1 of Schedule 1 of the Resource Management Act 1991 ('RMA').
2. To determine whether there are any ratepayers and other persons (including statutory agencies) who are likely to be directly affected in terms of Clause 5A(3) and who should accordingly be served notice of the request.
3. To determine the length of the submission period.

## Whakarāpopototanga matua

### Executive Summary

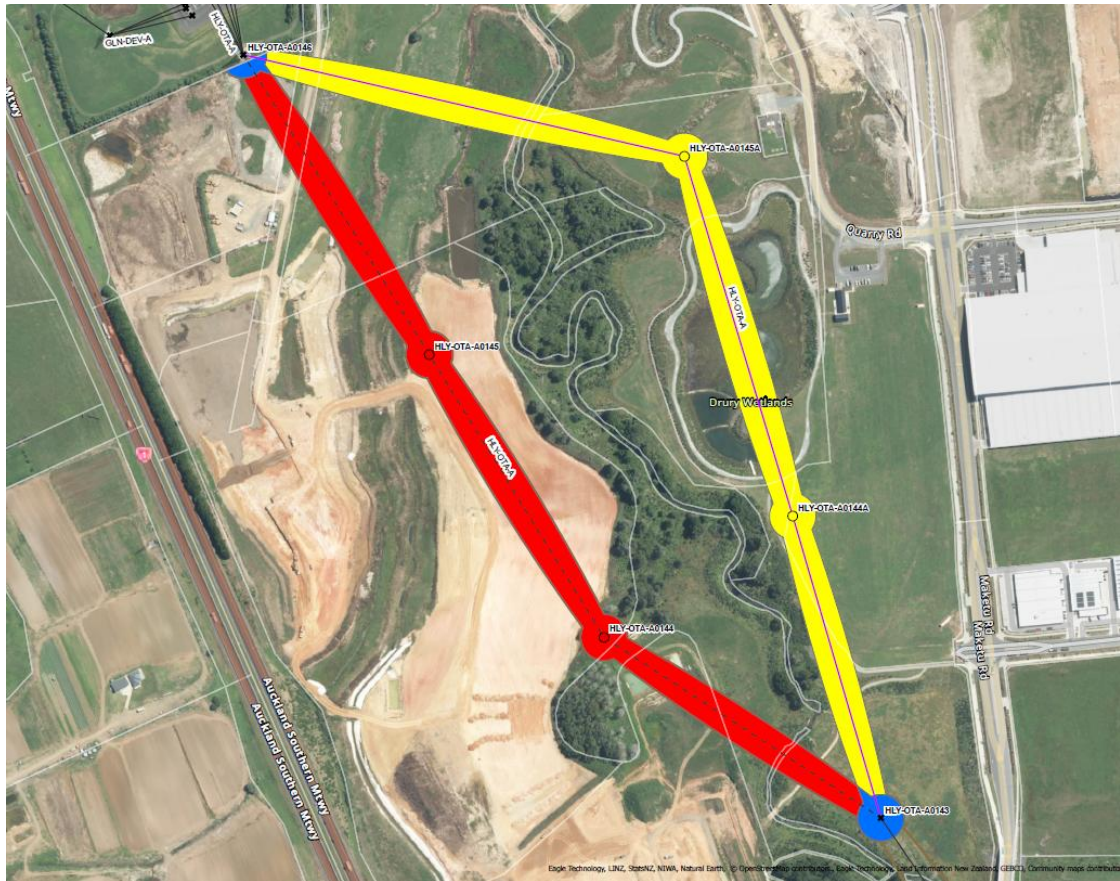
4. This report considers the notification process for a private plan change (PPC) request by Transpower Limited (**Transpower** or **the requestor**). The PPC applies to land at 37 Harrison Road, 263 and 391 Quarry Road, 51 Maketu Road and 2 Kuku Road, Drury. Drury South Limited owns all of the land, excluding 391 Quarry Road and 51 Maketu Road, which is owned by Auckland Council.
5. A high-level assessment of effects has been undertaken in order to determine whether directly affected parties can be identified with sufficient certainty to determine that limited notification is appropriate.

6. Given the limited nature of the PPC, there will be no effects on the wider environment and all of the persons who will be directly affected are able to be identified. Therefore, the test in clause 5A(2) is met and the council may limited notify the plan change.
7. In terms of clause 5A(3), all persons directly affected by the proposed plan change have been identified. They will be sent a copy of the limited notice and such further information as the council thinks fit relating to the private plan change, in accordance with clause 5A(4) and 5A(5). These include properties in the plan change area and Requiring Authorities with designations within the plan change area.
8. The submission period should be the minimum of 20 working days.

## Horopaki Context

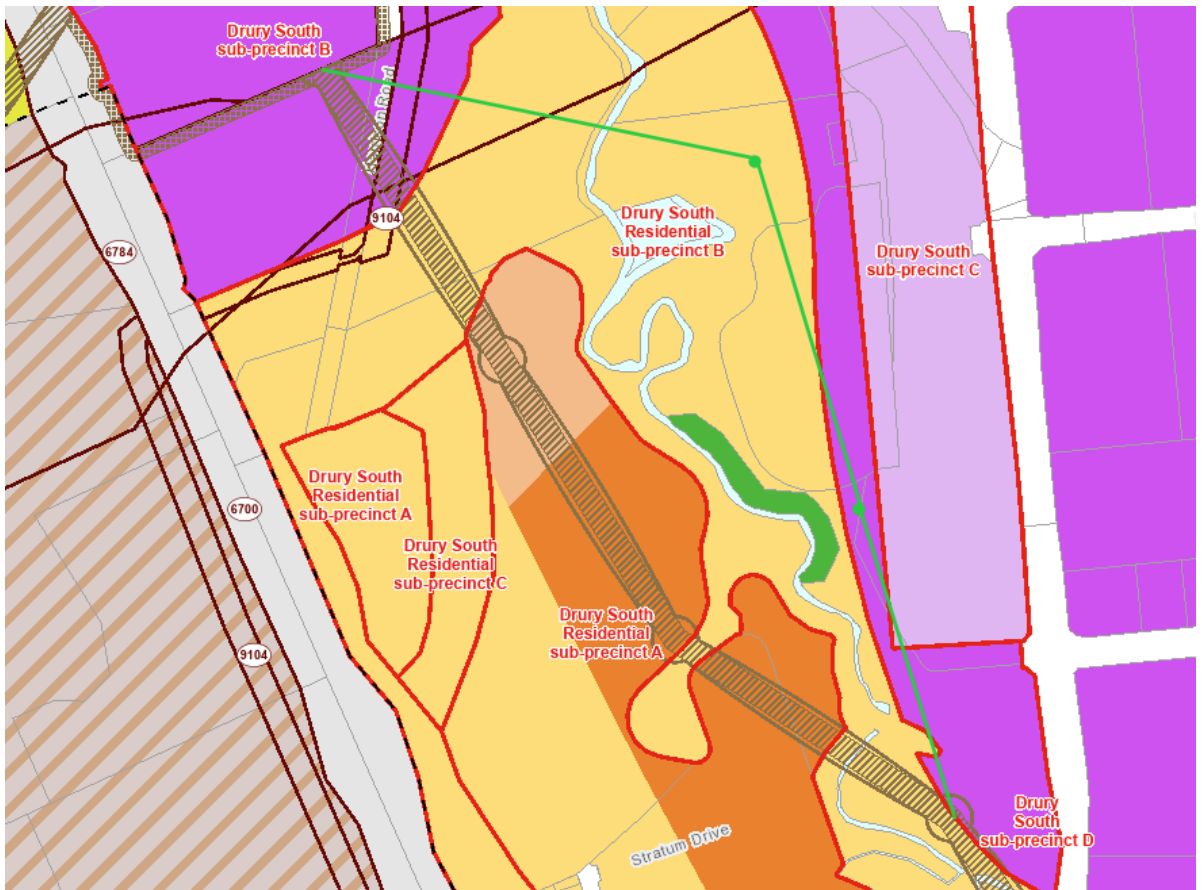
### Private Plan Change Area and Surrounds

9. The plan change area comprises 37 Harrison Road, 263 and 391 Quarry Road, 51 Maketu Road and 2 Kuku Road, Drury (**See Figure 1**). The majority of the land is owned by Drury South Limited except for 391 Quarry Road and 51 Maketu Road, which is owned by Auckland Council. 37 Harrison Road and 263 Quarry Road are subject to designation 6784 Drury South Interchange Connections. 263 Quarry Road is subject to designation 9104 Pukekohe to East Tamaki Gas Pipeline (**See Figure 2**). Easements in favour of Transpower are in place over parts of the proposed alignment that have been vested to Auckland Council for stormwater management, and over riparian margins of the Hingaia Stream managed by the Department of Conservation.
10. The subject land is within the existing urban boundary of Drury. The existing and new alignments are partially within both the I410 Drury South Precinct, which primarily provides for industrial activity, and the I451 Drury South Residential Precinct, which primarily provides for residential activity. The proposed realignment removes the transmission line and National Grid Overlays from the main residential development area of the I451 Drury South Residential Precinct, sub-precinct A. The new alignment instead places the transmission line and National Grid Overlays primarily in I451 Drury South Residential Precinct sub-precinct B and I410 Drury South Precinct sub-precinct D, the primary purpose of both sub-precincts being informal open space/recreational use and stormwater management (**See Figure 2**).
11. The existing and proposed alignments cross over the Hingaia stream, and the proposed alignment crosses over a wetland. Both existing and proposed alignments cross over the airspace above Harrison Road, managed by Auckland Transport. Drury South Limited is developing the land under the existing and proposed alignments.



**Figure 1 – Proposed overlay area highlighted in yellow (taken from section 32 evaluation)**

12. Immediately to the east of the proposed overlay area is the Drury South industrial precinct. Further east, the site is approximately 1.5km from the Stevenson Aggregates Quarry. The proposed overlay originates from the Transpower Drury Substation, which fronts State Highway 1. The zoning pattern underlying the PPC area reflects a series of plan changes and variations in the local area and includes Business – Light Industry, Mixed Housing – Suburban and Business – Mixed Use Zone. To the north and east of the proposed overlay area is mainly a mix of Business and Industry zoning, while to the south and west is a mix of residential zonings. To the west of State Highway 1 is Future Urban and Rural zoning. This zoning pattern is shown in Figure 2.



**Figure 2 Existing AUP zoning and precincts with existing National Grid Corridor overlays and proposed realignment (green line to the RHS)**

### The Private Plan Change

13. The PPC request and AEE/s32 evaluation is provided as Attachment A to this report.
14. No clause 23 requests were requested of the applicant and the PPC request remains unmodified from lodgement.
15. The following purpose and reason for the plan change request being the most appropriate method is set out in the report by Transpower:
  - a. The transmission line is being realigned between existing Towers 143 and 146 at the request and funding of the developer for the Drury South Precinct, so that land proposed for residential development can occur unencumbered by the existing transmission lines and the related planning restrictions. The National Grid Corridor Overlay needs to be applied to the new alignment to protect it in the long-term from the activities of other parties, particularly as land is on-sold as it is developed.

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...

*The intent of the Plan Change is to amend the planning maps to ensure the National Grid Yard and National Grid Subdivision Corridor are applied to the new alignment of the transmission line.*

16. The Plan Change proposes to:
  - a. Apply the **National Grid Yard Uncompromised Overlay** 12m either side of the centre line of the proposed Huntly–Otahuhu A transmission line.
  - b. Apply the **National Grid Subdivision Corridor Overlay** to the proposed Huntly–Otahuhu A transmission line with a 22.5m radius around each support structure.

- c. Adjust the **National Grid Substation Corridor** to cover the current 'gap' in the **National Grid Substation Corridor Overlay** and allow the National Grid Corridor Overlays to overlap.

## The Resource Management Act

17. The private plan change request has been accepted by the council on 24/03/26, in accordance with clause 25(2)(b) of Part 2 of Schedule 1 to the RMA.
18. Where the council accepts the request under clause 25(2)(b), it must notify the plan change request within 4 months of agreeing to accept the request in accordance with Clause 26 (1) (b)(i). Clause 29 of Schedule 1 states that Part 1 of Schedule 1, with all necessary modifications, shall then apply to the processing of any plan change request accepted under Clause 25(2)(b).
19. Part 1 of Schedule 1 of the RMA specifies certain persons must be served a copy of the private plan change request irrespective of whether the proposed change is limited or publicly notified. These persons are set out in clauses 5(4) and 5A(8) of Schedule 1 and include iwi authorities and Ministers.
20. In addition, under Clause 5(1)(b), the council must do one of the following, as appropriate:
  - (i) publicly notify the proposed policy statement or plan; or
  - (ii) give limited notification, as provided for in clause 5A(2).
21. Clause 5A(2) states:
  - (2) *The local authority may give limited notification, but only if it is able to identify all the persons directly affected by the proposed change or a variation of a proposed policy statement or plan.*
22. Advice from the Ministry for the Environment states "The requirement to identify everyone who is directly affected by the plan change means that limited notification is likely to be used for minor, small scale, or discrete plan changes, for example aligning zones to new property boundaries, or a spot-zoning."
23. If the council determines that the private plan change should be publicly notified, it also needs to determine whether there are any persons who, in the council's opinion, are likely to be directly affected by the private plan change and send those persons a copy of the public notice specifically.
24. Clause 5(1A) sets out two options for direct notification:
  - (a) *send a copy of the public notice, and such further information as the territorial authority thinks fit relating to the proposed plan, to every ratepayer who is likely to be directly affected by the proposed plan; or*
  - (b) *include the public notice, and such further information as the territorial authority thinks fit relating to the proposed plan, in any publication or circular which is issued or sent to all residential properties and Post Office box addresses located in the affected area.*
25. In addition to 5(1A) (a) or (b), Clause 5(1A) states the council shall send a copy of the public notice to any other person who, in the council's opinion, is directly affected by the plan change.

26. The notification determination is a procedural decision which cannot be appealed to the Environment Court but can be judicially reviewed to the High Court.
27. Once a decision on notification has been made, the council shall prepare the plan change notification material in consultation with the requestor (clause 26(1)(a) of Schedule 1) and follow the notification steps set out in the RMA, including preparation of a public notice and notification of statutory bodies.
28. Council has a discretion as to the length of the submission period. Clause 5(3) of Schedule 1 states:

*The closing date for submissions:*

*(a) shall, in the case of a proposed policy statement or plan, be at least 40 working days after public notification; and*

*(b) shall, in the case of a proposed change or variation to a policy statement or plan, be at least 20 working days after public notification.*
29. The use of the words 'at least' indicates that the council may specify a longer time period without having to extend the timeframe under section 37 of the RMA, although any extension needs to recognise the principles set out in section 18A of the RMA to use timely and efficient processes.

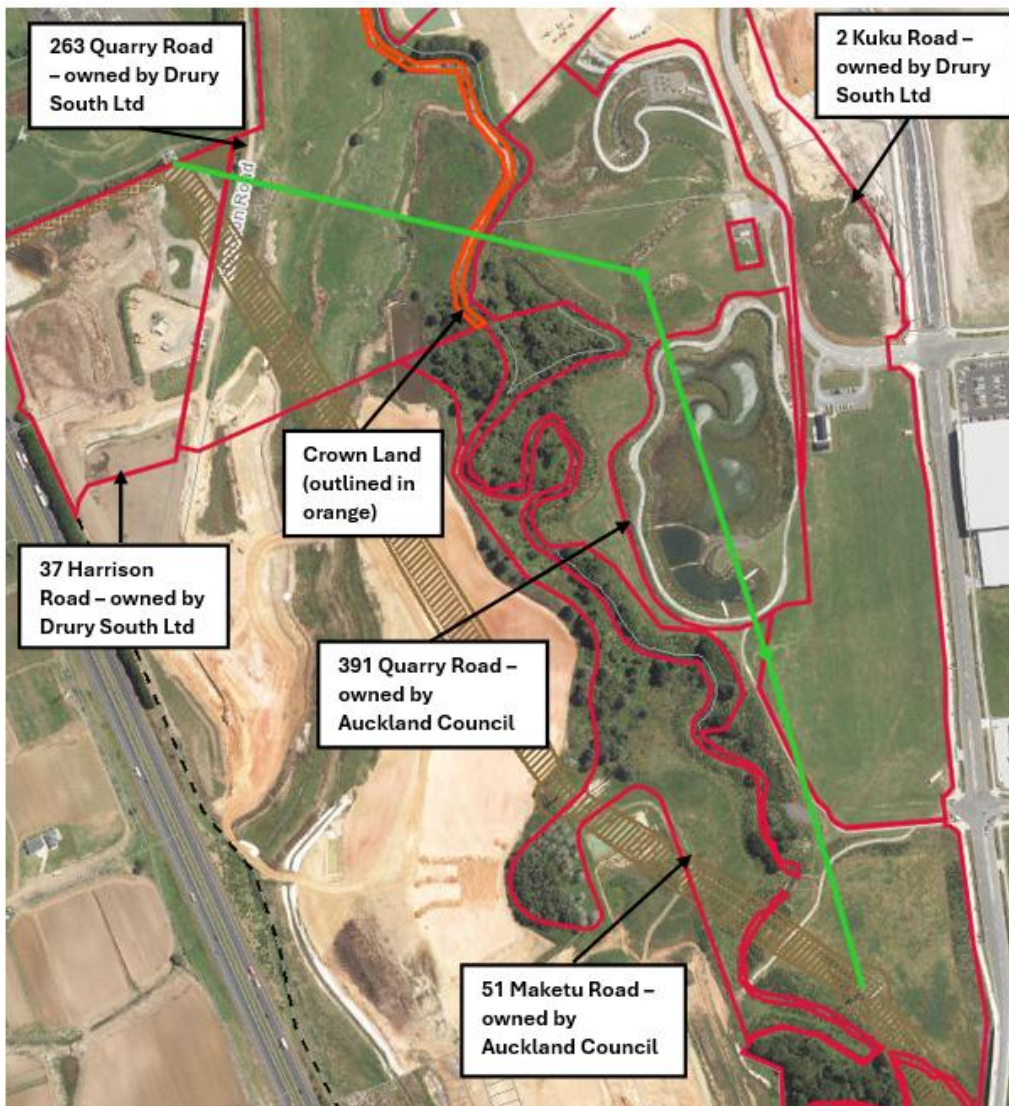
## **Te aromatawai whakamōhiotanga**

### **Notification Assessment**

30. The requestor has suggested limited notification of the PPC to a number of parties.
31. A high-level assessment of effects has been undertaken in order to identify ratepayers and any other persons (including statutory agencies) who are likely to be directly affected by the proposed plan change.
32. The review of the request indicates that the possible effects of the PPC are limited to the properties to which the proposed realignment of the National Grid Corridor Overlays apply.
33. As the proposed overlay realigns the National Grid Corridor Overlays away from the I451 Drury South Residential Precinct sub-precinct A to more closely align with land intended for open space and stormwater management in the I451 Drury South Residential Precinct sub-precinct B and I410 Drury South Precinct sub-precinct D, Transpower considers that the realignment of the National Grid Corridor Overlays will not compromise the purpose of the precinct and will not generate effects on the wider public. The resource consents required for the location and physical works are the subject of a separate assessment by the resource consent team
34. The owners of the land to which the proposed National Grid Corridor Overlays apply are Drury South Limited and Auckland Council. Transpower has provided written approval from Drury South Limited, the landowner of 37 Harrison Road, 263 Quarry Road and 2 Kuku Road, Drury, for the proposed transmission line and support structure works being assessed through the resource consent team.
35. Easements in favour of Transpower that follow the proposed transmission line and National Grid Corridor Overlays realignment are in place on land owned by Auckland Council at 51

Maketu Road and 391 Quarry Road, Drury and on parts of the Hingaia Stream margin that are managed by the Department of Conservation.

36. Transpower have provided written approval from Auckland Transport for the proposed transmission line and support structure works being assessed through the resource consent team, as the proposed realignment of the transmission line crosses over the airspace above Harrison Road.
37. Requiring authorities holding designations in the proposed overlay area, including NZTA designation 6784 Drury South Interchange Connections and First Gas Ltd designation 9104 Pukekohe to East Tamaki Gas Pipeline, have provided written approval to Transpower for the proposed transmission line and support structure works being assessed through the resource consent team.
38. As the written approvals provided by Transpower do not clearly indicate approval for the proposed National Grid Corridor Overlays over the transmission line realignment – (the subject of this PPC), but rather for the activity and the works associated with the relocation of the transmission line, the potential effects of the PPC on all directly affected parties have been considered in this notification assessment.
39. Out of a precautionary approach, and at the request of Transpower, all directly affected parties who have provided written approval for the proposed transmission line realignment should be given notice of the proposed PPC.
40. A preliminary review of the plan change identified restrictions to subdivision, use and development under the National Grid Corridor Overlays as a key effect to be considered. Under Clause 5(1A)(b)(ii) and Clause 5A(2), limited notification is appropriate as these effects are limited to the owners of the land and the requiring authorities with designations on the land to which the proposed realigned overlays apply, enabling the Council to identify all those persons who may be directly affected by these potential effects of the proposed plan change.
41. Those properties likely to be directly affected are those within the red outline in Figure 3. These include:
  - land that is included in the proposed overlay area
  - designations that are included in the proposed overlay area



**Figure 3 – Directly affected properties (proposed transmission line realignment outlined in green)**

42. Clause 5A(3), is to be followed, that is to serve limited notification on all persons identified as being directly affected by the proposed change or variation.
43. In addition to the public bodies specified in Clause 5A(8) of the First Schedule, being:
- the Minister for the Environment
  - the tangata whenua of the area, through iwi authorities,
- a copy of the notification letter (or an advice memo in the case of Auckland Council) should also be provided to:
- Auckland Transport
  - New Zealand Transport Agency
  - Department of Conservation
  - First Gas Limited
  - Drury South Limited
  - Auckland Council

## **Notification Assessment: Submission Period**

44. Clause 5A(6) of Schedule 1 states that the closing date for submissions shall be at least 20 working days after limited notification.
45. The 20-working day period is a minimum period. There is nothing about this plan change that requires a longer submission period.

## **Tirohanga a te poari**

### **Local Board view**

46. After the submission period closes, council staff will provide the Franklin local board with a summary of submissions and seek formal feedback from the local board through a report to a board meeting.
47. If the local board passes a resolution and provides their views, these views will be included in the section 42A hearing report. This report gives recommendations about the proposed plan changes to the independent decision maker(s) who are appointed under delegation. The local board can attend the council hearing and speak to its views (only if formal views are provided).

## **Aromatawai iti te whakamaarama**


### **Notification Conclusion**

48. The proposed private plan change by Transpower should be limited notified as the PPC only affects the land to which it applies and I am able to identify all directly affected persons. The ratepayers identified in Figure 3 of this report and any other persons (including statutory agencies) who in the Council's opinion, are likely to be directly affected by the private plan change request, should be notified. In accordance with Clause 5A(6) of Schedule 1 the submission period should be 20 working days.

## **Ngā tāpirihanga**

### **Attachments**

**A: Private Plan Change Request and s32 evaluation**

	<p>Resource Management Act 1991</p> <p>Auckland Unitary Plan</p> <p>Plan Change</p> <p><b>Plan Change Request and Section 32 Evaluation</b></p>	<p>Plan Change Number TBC</p>
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**AMENDING THE NATIONAL GRID CORRIDOR OVELAY ON THE PLANNING MAPS TO RECOGNISE THE PART RELOCATION OF THE HLY-OTA A TRANSMISSION LINE AT DRURY SOUTH**

**Overview**

The following report has been prepared to support a privately initiated plan change (Plan Change) by Transpower Limited (Transpower) to the Auckland Unitary Plan – Operative in part (AUP). The proposal is to amend the location of the *National Grid Corridor Overlay – National Grid Yard Uncompromised*, and *National Grid Corridor Overlay – National Grid Subdivision Corridor* for a section of the Huntly–Otahuhu A (HLY–OTA A) 220kV transmission line at Drury South, to match the proposed new alignment for which resource consent has been sought. A minor change to the *National Grid Corridor Overlay – National Grid Substation Corridor* where the HLY-OTA A transmission line connects to the Drury Substation is also required as a consequence of the amended transmission line alignment at the substation interface.

The plan change request has been prepared in accordance with the requirements of s32 of the Resource Management Act 1991 (RMA or the Act).

The AUP includes mapped transmission line corridors to protect existing National Grid transmission lines from the adverse effects of other activities. It also includes mapped buffer areas around substations to protect the operation of these from adjacent activities. Chapter D26 includes an objective, policies and rules for the *National Grid Corridor Overlay* relating to these mapped corridors and areas to ensure the efficient development, operation, maintenance and upgrading of the National Grid is not compromised by subdivision, use and development. These provisions collectively provide for the protection of electricity transmission corridors and substations and give effect to the directives of the *National Policy Statement on Electricity Transmission 2008* (NPSET) and the Regional Policy Statement policy framework of the AUP in Chapter B3 in regard to infrastructure.

Drury South Limited is progressively undertaking urban development of the Drury South area within the AUP Drury South Residential Precinct. The development footprint is affected by the existing HYL-OTA A transmission line alignment, and accordingly they have requested that Transpower relocate part of the transmission line to enable development of the Drury South Residential Precinct to be better integrated with the transmission line (see Figure 1). A resource consent application to enable the realignment has been separately lodged with Auckland Council.

The existing *National Grid Yard Uncompromised*, and *National Grid Subdivision Corridor* are mapped in the AUP on the current alignment, and this will need to be relocated to reflect the new transmission line alignment. A small consequential change to the *National Grid Substation Corridor* is also required to infill the gap where the *National Grid Yard Uncompromised* will be removed from the planning maps.

The outer extent of the *National Grid Subdivision Corridor* on the new alignment is based on the modelled extent of line swing on the new spans along with a 22.5m radius around each support

structure reflecting how this overlay is currently provided for on the AUP maps for existing transmission lines.

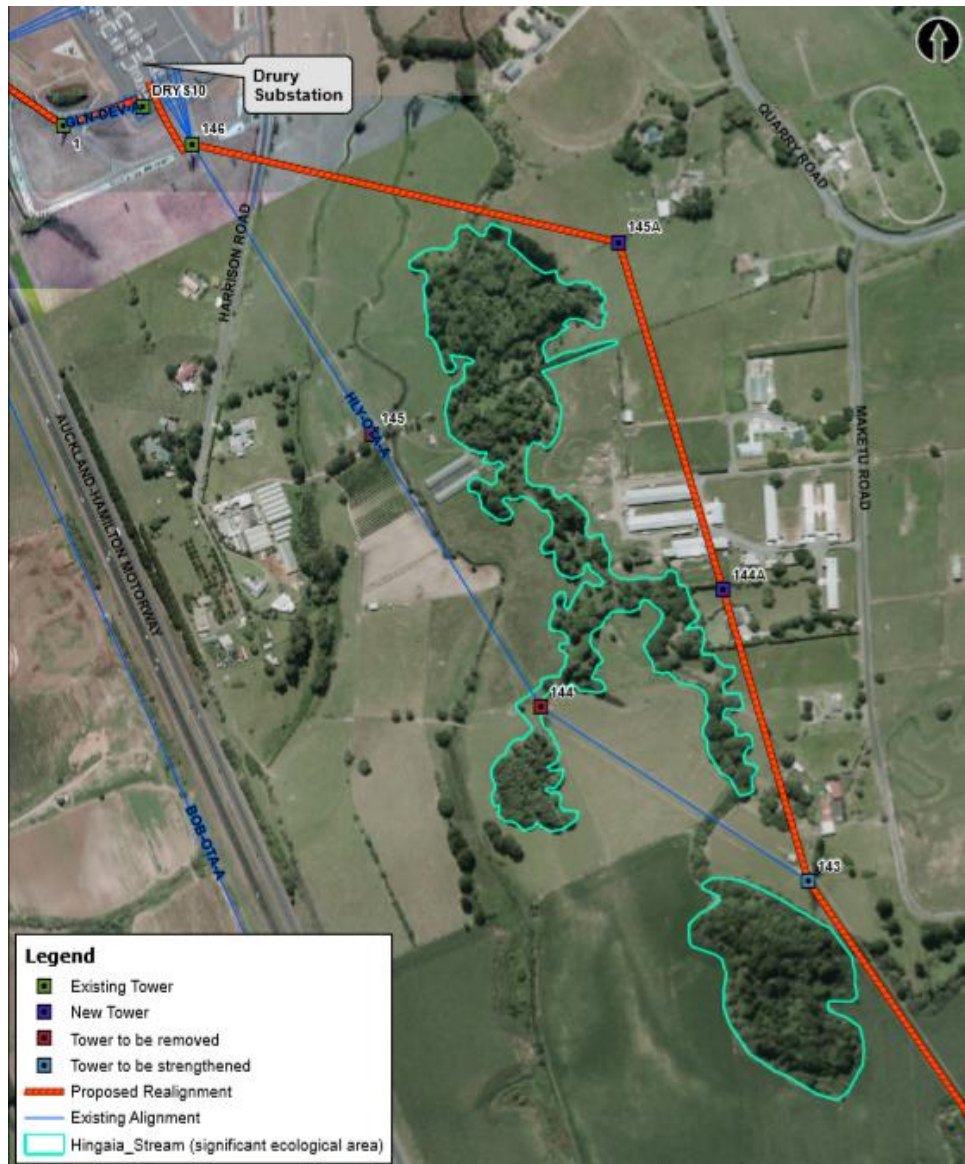


Figure 1: Overview of Existing and Proposed Alignment

Note to Figure 1; buildings shown under the proposed spans have now been removed

The *National Grid Yard Uncompromised* will be the same fixed width as the existing alignment, being 12m either side of the centre line of the transmission line.

The changes required to the AUP maps are shown on Figures 2, 3 and 4 below and in Appendix 1. No other changes to the AUP are required. Relevant objectives, policies and rules in the AUP will remain unchanged.

Once approved, Transpower will advise in writing when the new overlays should be shown on the planning maps and have effect, and the old mapped overlays removed, so this occurs in an orderly manner when the new line is commissioned. GIS shape files will be provided by Transpower when the Council requires these for map updates.



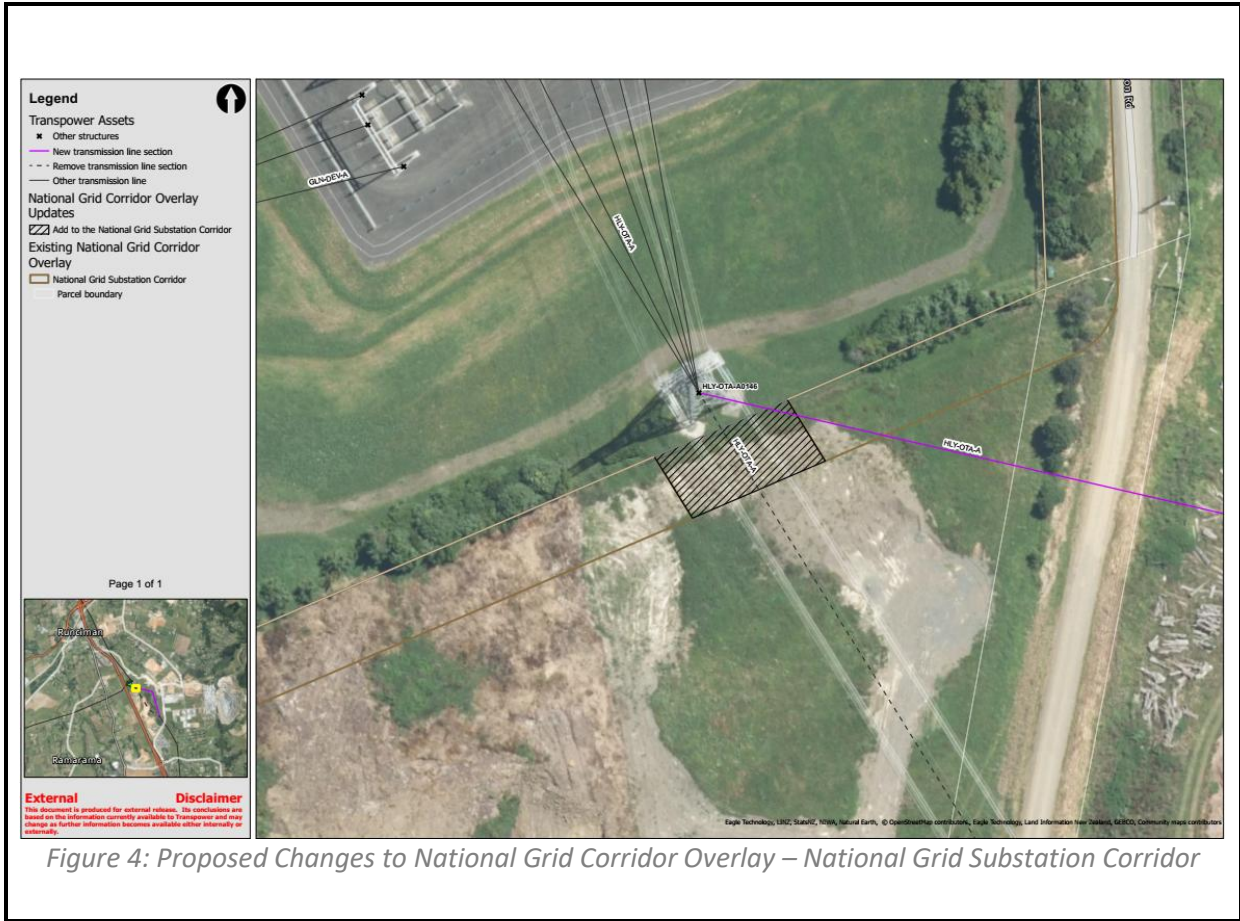


Figure 4: Proposed Changes to National Grid Corridor Overlay – National Grid Substation Corridor

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## **1 Introduction**

### **1.1 Purpose of this report**

- 1.1.1 The purpose of this report is to outline the proposed private Plan Change and fulfil the requirements of s32 of the RMA. The overarching purpose of s32 is to ensure that plans are developed using sound evidence and rigorous policy analysis, leading to more robust and enduring provisions.
- 1.1.2 Section 32 requires an evaluation of the changes proposed to the AUP. The evaluation must examine whether any proposed changes to objectives are the most appropriate way to achieve the purpose of the RMA, and whether the proposed provisions are the most appropriate way to achieve the objectives of the AUP. In this instance, no changes to the objectives, policies or rules of the AUP are proposed, so the provisions that the assessment relates to are proposed changes to mapping which is the mechanism in the AUP for engaging the rules and policy framework. The report must consider reasonably practicable options and assess the efficiency and effectiveness of the provisions in achieving the objectives. This will involve identifying and assessing the benefits and costs of the environmental, economic, social and cultural effects anticipated from implementing the provisions. The report must also assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.
- 1.1.3 The requested plan change (mapping amendments) is set out in Appendix 1 to this report, and the background to why it is required is included in Section 3 below.

## **2 Resource management issues**

### **2.1 Council's legal obligations and strategic planning documents**

- 2.1.1 Sections 74 and 75 of the RMA set out a Council's obligations when preparing or considering a change to its District Plan. The relevant provisions in the AUP are district plan provisions, aside from where the National Grid Corridor Overlay crosses the Coastal Marine Area (CMA) which is not applicable to this Plan Change. The Council has a responsibility under Section 31 of the RMA to establish, implement and review objectives and provisions for, among other things, achieving the integrated management of the effects of the use, development, or protection of land and associated resources. One of the Council's functions is to control the actual and potential effects of land use or development on the environment, and to do so in accordance with the provisions of Part 2 of the RMA.
- 2.1.2 As required by s74 and s75 of the RMA, a plan change must specifically give effect to, not be inconsistent with, take into account, or have regard to the "higher order" documents outlined below which provide directions for the issues relevant to this Plan Change:

#### **RMA Part 2**

- 2.1.3 Section 5 of the RMA sets out the purpose of the Act, as being to achieve the sustainable management of natural and physical resources. In achieving its purpose, the principles in Sections 6, 7 and 8 must be considered.

- 2.1.4 Section 6 of the RMA lists matters of national importance that must be recognised and provided for in achieving the purpose of the Act. None of these matters are relevant to this Plan Change.
- 2.1.5 Section 7 of the RMA lists other matters where particular regard is required to be had in achieving the purpose of the Act. Of relevance to this, and required to be considered through this evaluation, is Section 7(b), the efficient use and development of natural and physical resources.
- 2.1.6 Section 8 of the RMA states the obligation to take account of the principles of the Treaty of Waitangi when exercising functions under the Act.

### **Higher Order and Other Planning Documents**

- 2.1.7 As required by s74 and s75 of the RMA a plan change for a district plan must specifically:
  - a. Give effect to any national policy statement, any New Zealand coastal policy statement, a national planning standard and any regional policy statement;
  - b. Not be inconsistent with a water conservation order or a regional plan;
  - c. Have regard to proposed regional policy statements and regional plans; management plans and strategies prepared under other Acts; relevant entries on the New Zealand Heritage List/Rārangi Kōrero; regulations relating to ensuring sustainability, or the conservation, management, or sustainability of fisheries resources; relevant project area and project objectives if section 98 of the Act applies; and the extent to which the plan needs to be consistent with plans of adjacent territorial authorities; and
  - d. Take account of any relevant planning document recognised by an iwi authority and lodged with the territorial authority to the extent that its content has a bearing on the resource management issues of the district.
- 2.1.8 The Plan Change must give effect to the *National Policy Statement on Electricity Transmission 2008* (NPSET). Relevant provisions are set out in Table 1 below.

Table 1 – Relevant Provisions of National Policy Statement of Electricity Transmission 2008

Document	Relevant provisions	Relevant direction given effect to
National Policy Statement on Electricity Transmission 2008 (NPSET)	OBJECTIVE	<p><i>To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while:</i></p> <ul style="list-style-type: none"> <li><i>• managing the adverse environmental effects of the network; and</i></li> <li><i>• managing the adverse effects of other activities on the network.</i></li> </ul>
	<b>Recognition of the national benefits of transmission</b>	
	POLICY 1	<p><i>In achieving the purpose of the Act, decision-makers must recognise and provide for the national, regional and local benefits of sustainable, secure and efficient electricity transmission. The benefits relevant to any particular project or development of the electricity transmission network may include:</i></p> <ul style="list-style-type: none"> <li><i>i) maintained or improved security of supply of electricity; or</i></li> <li><i>ii) efficient transfer of energy through a reduction of transmission losses; or</i></li> <li><i>iii) the facilitation of the use and development of new electricity generation, including renewable generation which assists in the management of the effects of climate change; or</i></li> <li><i>iv) enhanced supply of electricity through the removal of points of congestion.</i></li> </ul> <p><i>The above list of benefits is not intended to be exhaustive and a particular policy, plan, project or development may have or recognise other benefits.</i></p>
	<b>Managing the adverse effects of third parties on the transmission network</b>	
POLICY 10	<p><i>In achieving the purpose of the Act, decision-makers must to the extent reasonably possible manage activities to avoid reverse sensitivity effects on the electricity transmission network and to ensure that operation, maintenance, upgrading, and development of the electricity transmission network is not compromised.</i></p>	

	POLICY 11	<i>Local authorities must consult with the operator of the national grid, to identify an appropriate buffer corridor within which it can be expected that sensitive activities will generally not be provided for in plans and/or given resource consent. To assist local authorities to identify these corridors, they may request the operator of the national grid to provide local authorities with its medium to long-term plans for the alteration or upgrading of each affected section of the national grid (so as to facilitate the long-term strategic planning of the grid).</i>
	<b>Maps</b>	
	POLICY 12	<i>Territorial authorities must identify the electricity transmission network on their relevant planning maps whether or not the network is designated.</i>

- 2.1.9 The NPSET has a single objective, which in summary is to recognise the national significance of the electricity transmission network and to ensure this meets the needs of present and future generations, whilst managing the adverse effects of the network on the environment and managing the adverse effects of the other activities on the network.
- 2.1.10 The effects of the altered transmission line alignment have been adequately taken into account in approving the resource consent application for the new alignment. These effects were assessed as less than minor when considered in combination with removing the existing transmission line. It is requested that a decision on this Plan Change is not made until after that application is granted. In relation to the effects of other activities on the transmission line and the Drury Substation, the proposed corridor provisions are consistent with Policy 1 in that they will help maintain security of supply that has local, regional and national benefits by protecting the new alignment from the activities of other parties, whilst it also supports the minor update of the buffer around the substation as a consequential change. It also directly implements Policies 10 and 11 that require activities to be managed to avoid reverse sensitivity effects on the electricity transmission network, and for local authorities to work with Transpower to identify an appropriate buffer corridor where it can be expected that sensitive activities (such as residential or educational activities) will generally not be provided for or given resource consent. Policy 12 also requires the electricity transmission line to be identified on the relevant planning maps.
- 2.1.11 The AUP already includes overlay mapping and associated objectives, policies and rules for the National Grid Corridor Overlay. The objective, policies and rules are included in Chapter D26 whilst the planning maps include a National Grid Corridor Overlay which breaks down into the National Grid yard (Compromised and Uncompromised), the National Grid Substation Corridor, and the National Grid Subdivision Corridor.
- 2.1.12 The National Grid Yard (Uncompromised) is an area 12m either side of the centre line of the transmission line that is generally not compromised by the presence of existing buildings and is subject to limitations on new development. The National Grid Subdivision Corridor is a variable

width along each span of the transmission line based on modelled line swing to ensure future subdivision does not compromise access to lines or enable building sites for incompatible activities. In addition, a 22.5m radius around each support structure is provided to ensure subdivision does not compromise access to structures, and to minimise the risk of Earth Potential Rise (EPR). The National Grid Yard (Uncompromised) and National Grid Subdivision Corridor overlay are already in place along the existing spans to be replaced. The changed alignment into the Drury Substation results in a minor change on the Substation Corridor that will be updated as a consequence of the realignment. This will result in the National Grid Yard and National Grid Substation Corridor overlapping which in Transpower’s view is how this should currently be shown in the AUP. Relocating the National Grid Corridor Overlay as proposed in this Plan Change is fully consistent with, and gives effect to, the NPSET.

2.1.13 There are no other relevant national policy statements, including the New Zealand Coastal Policy Statement, or national planning standards to give effect to in the case of this Plan Change (section 75(3)).

2.1.14 Chapter B of the AUP incorporates the Auckland Regional Policy Statement. Relevant provisions are included in Table 2 below.

*Table 2 – Relevant Provisions of the Auckland Regional Policy Statement (Chapter B of AUP)*

<b>Relevant provisions</b>	<b>Relevant direction given effect to</b>
<b>B2.2 Urban Growth and Form</b>	
B2.2.1. Objectives	<p>1A) A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.</p> <p>(1) A well-functioning urban environment with a quality compact urban form that enables all of the following:</p> <ul style="list-style-type: none"> <li>(a) a higher-quality urban environment;</li> <li>(b) greater productivity and economic growth;</li> <li>(c) better use of existing infrastructure and efficient provision of new infrastructure;</li> <li>(d) good accessibility for all people, including by improved and more efficient public or active transport;</li> <li>(e) greater social and cultural vitality;</li> <li>(f) better maintenance of rural character and rural productivity;</li> <li>(g) reduced adverse environmental effects; and</li> <li>(h) improved resilience to the effects of climate change.</li> </ul> <p><b>[PC120 adds</b>  <b>(i) avoiding natural hazard risks where the risks are significant or managing natural hazard risks where the risks are tolerable or acceptable]</b></p> <p>(3) Sufficient development capacity and land supply is provided to accommodate residential, commercial, industrial growth and social facilities to support growth.</p>
B2.2.2 Policies	<p><i>Development capacity and supply of land for urban development</i></p> <p>(1) Include sufficient land within the Rural Urban Boundary that is appropriately zoned to accommodate at any one time a minimum of seven years’ projected</p>

	<p>growth in terms of residential, commercial and industrial demand and corresponding requirements for social facilities, after allowing for any constraints on subdivision, use and development of land.</p> <p><i>Quality compact urban form</i></p> <p>(4) Promote urban growth and intensification within the urban area 2016 (as identified in Appendix 1A), enable urban growth and intensification within the Rural Urban Boundary, towns, and rural and coastal towns and villages, in a way that contributes to a well-functioning urban environment and avoid urbanisation outside these areas.</p>
<p><b>B2.3 A Quality Built Environment</b></p>	
<p>B2.3.1 Objectives</p>	<p>(1) A well-functioning urban environment with a quality built environment where subdivision, use and development do all of the following:</p> <ul style="list-style-type: none"> <li>(a) respond to the intrinsic qualities and physical characteristics of the site and area, including its setting;</li> <li>(b) reinforce the hierarchy of centres and corridors;</li> <li>(c) contribute to a diverse mix of choice and opportunity for people and communities;</li> <li>(d) maximise resource and infrastructure efficiency;</li> <li>(e) are capable of adapting to changing needs; and</li> <li>(f) has improved resilience to the effects of climate change.</li> </ul> <p><b>[PC120 adds</b></p> <p><b><i>(g) avoiding natural hazard risks where the risks are significant or managing natural hazard risks where the risks are tolerable or acceptable]</i></b></p>
<p>B2.3.2 Policies</p>	<p>(1) Manage the form and design of subdivision, use and development so that it contributes to a well-functioning urban environment and does all of the following:</p> <ul style="list-style-type: none"> <li>(a) supports the planned future environment, including its shape, landform, outlook, location and relationship to its surroundings, including landscape and heritage;</li> <li>(b) contributes to the safety of the site, street and neighbourhood;</li> <li>(c) develops street networks and block patterns that provide good access and enable a range of travel options;</li> <li>(d) achieves a high level of amenity and safety for pedestrians and cyclists;</li> <li>(e) meets the functional, and operational needs of the intended use;</li> <li>(f) allows for change and enables innovative design and adaptive re-use; and</li> <li>(g) improves resilience to the effects of climate change.</li> </ul> <p><b>[PC120 adds</b></p>

	<i>(h) avoiding natural hazard risks where the risks are significant or managing natural hazard risks where the risks are tolerable or acceptable]</i>
<b>B3.2 Infrastructure</b>	
B3.2.1 Objectives	<p>(1) Infrastructure is resilient, efficient and effective.</p> <p>(4) The functional and operational needs of infrastructure are recognised.</p> <p>(6) Infrastructure is protected from reverse sensitivity effects caused by incompatible subdivision, use and development.</p> <p>(7) The national significance of the National Grid is recognised and provided for and its effective development, operation, maintenance and upgrading are enabled.</p>
B3.3.3 Policies	<p><i>Reverse sensitivity</i></p> <p>(4) Avoid where practicable, or otherwise remedy or mitigate, adverse effects of subdivision, use and development on infrastructure.</p> <p>(5) Ensure subdivision, use and development do not occur in a location or form that constrains the development, operation, maintenance and upgrading of existing and planned infrastructure.</p>
<b>B6.5 Protection of Mana Whenua Cultural Heritage</b>	
B6.5.1 Objectives	<p>(1) The tangible and intangible values of Mana Whenua cultural heritage are identified, protected and enhanced.</p> <p>(2) The relationship of Mana Whenua with their cultural heritage is provided for.</p> <p>(3) The association of Mana Whenua cultural, spiritual and historical values with local history and whakapapa is recognised, protected and enhanced.</p>
B6.5.2 Policies	<p>(1) Protect Mana Whenua cultural and historic heritage sites and areas which are of significance to Mana Whenua.</p> <p>(6) Protect Mana Whenua cultural heritage that is uncovered during subdivision, use and development by all of the following:</p> <p>(a) requiring a protocol to be followed in the event of accidental discovery of kōiwi, archaeology or artefacts of Māori origin;</p> <p>(b) undertaking appropriate actions in accordance with mātauranga and tikanga Māori; and</p> <p>(c) requiring appropriate measures to avoid, remedy or mitigate further adverse effects.</p>

	<p>(7) Include a Māori cultural assessment in structure planning and plan change process to do all of the following:</p> <p>(a) identify Mana Whenua values associated with the landscape;</p> <p>(b) identify sites, places and areas that are appropriate for inclusion in the Schedule 12 Sites and Places of Significance to Mana Whenua Schedule for their Mana Whenua cultural heritage values as part of a future plan change; and</p> <p>(c) reflect Mana Whenua values.</p>
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- 2.1.15 The Regional Policy Statement identifies the significant resource management issues relevant to the region and provides direction in addressing these issues.
- 2.1.16 The objectives and policies for urban growth and form and a quality-built environment are particularly relevant to the transmission line relocation as this enables more efficient urban intensification including areas with higher density residential zonings in an area currently restricted by the presence of transmission lines. Drury South Limited has requested that Transpower relocate the transmission line further to the east such that the transmission line traverses that part of the Precinct Plan located in Sub-Precinct B intended for informal recreation and green infrastructure use, and part of the adjacent land with business zonings. This will enable Sub-Precinct A to be urbanised without constraints from the transmission line. The relocation works are being fully funded by the developer of the underlying land.
- 2.1.17 The objectives and policies for infrastructure seek that the benefits of infrastructure are recognised, development of infrastructure is enabled, and adverse effects are managed while noting the functional and operational needs of infrastructure. The objectives and policies also seek that infrastructure planning and land use planning are integrated to service growth efficiently and that infrastructure is protected from reverse sensitivity effects. Of particular relevance to this proposal is the explicit reference to the national significance of the National Grid and recognising and providing for its effective development, operation, maintenance and upgrading.
- 2.1.18 Any adverse effects on mana whenua from relocating the transmission line can be appropriately taken in account via the resource consent process. Once relocated, protecting the transmission line corridor will not adversely affect mana whenua cultural heritage.
- 2.1.19 The existing provisions in Chapter D26 National Grid Corridor Overlay of the AUP are consistent with the regional policy statement. Relocating the transmission line and protecting this transmission line and its interface with the substation by applying the National Grid Corridor Overlay, enables appropriate integration of urban growth and nationally significant infrastructure in Drury South, and is therefore consistent with the Regional Policy Statement.

1451.9.2 Drury South Residential – Precinct Plan 2

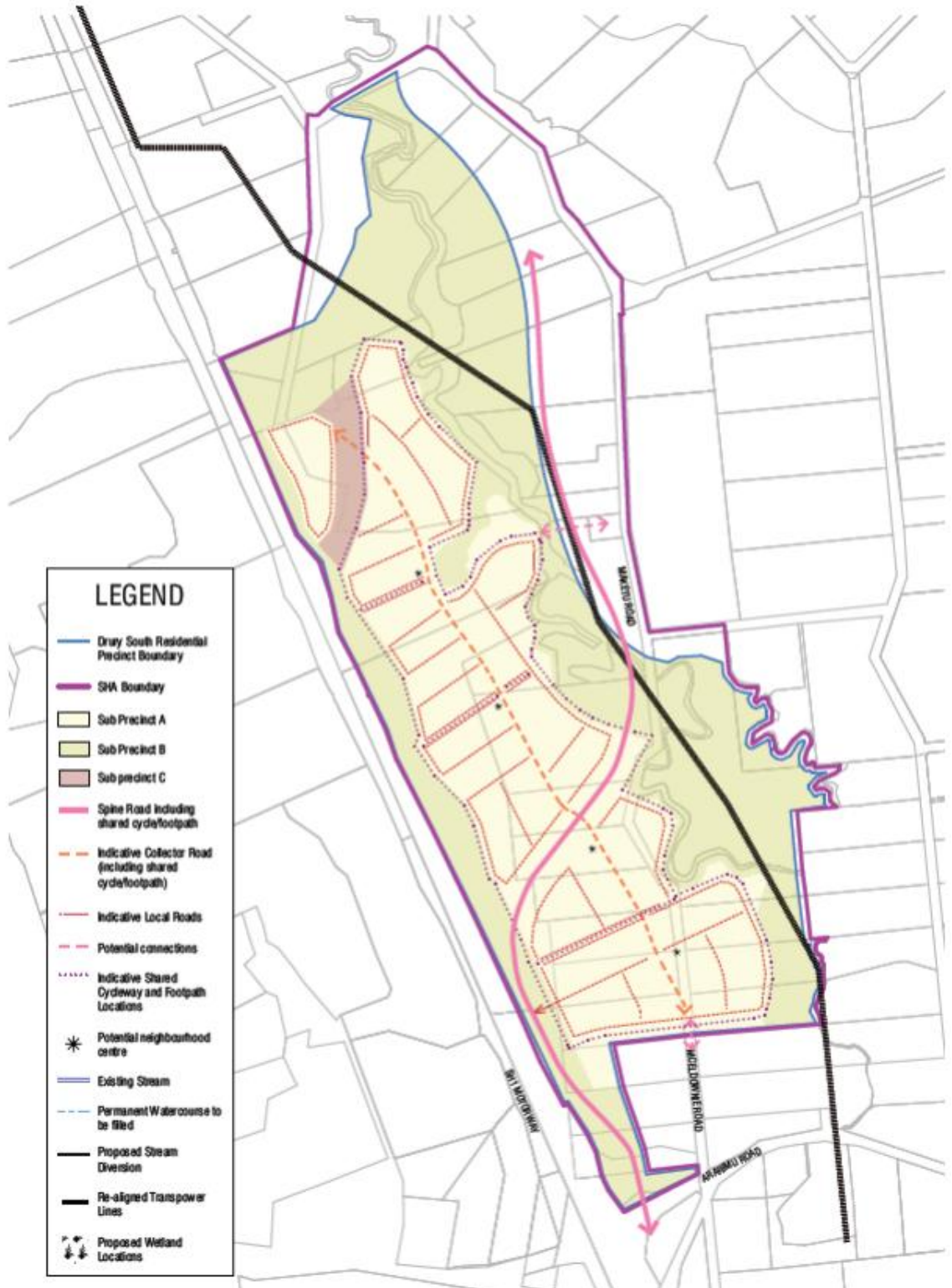


Figure 5: Drury South Residential – Precinct Plan 2 – Auckland Unitary Plan

- 2.1.20 The proposed Plan Change is not inconsistent with any Water Conservation Orders or any regional matter under a regional plan. No other management plans or strategies prepared under other Acts are relevant to the resource management issue identified.
- 2.1.21 *Tai Tumu Tai Pari Tai Ao, Waikato-Taunui Environmental Plan* has been reviewed. Provisions within Section 27, including Objective 27.3.1 and Policy 27.3.1.1, address the effects of electricity transmission but do not directly address the provision of buffer corridor provisions to protect existing transmission lines from the activities or third parties.
- 2.1.22 The proposed Plan Change also provides internal consistency within the AUP district plan provisions as it utilises the existing mechanism of mapping the National Grid Corridor Overlay to implement the existing provisions of Chapter D26. No changes to these provisions are proposed.
- 2.1.23 The proposed alignment in Drury South Residential Precinct – Sub-Precinct B (and peripheral parts of the adjacent business zones) better provides for the land use strategy in the area. This removes transmission lines from Sub-Precinct A to enable that area to be fully developed for residential purposes, whilst aligning the transmission line within an area proposed for passive recreation and green infrastructure.
- 2.1.24 The proposed new alignment is specifically shown on the plan in the AUP titled I451.9.2 Drury South Residential – Precinct Plan 2, so is fully anticipated in the planning strategy for the area (see Figure 5 above).

## 2.2 Problem definition - the issues being addressed

- 2.2.1 The AUP uses the National Grid Corridor Overlay to manage adverse effects on electricity transmission lines and substations. This includes a National Grid Subdivision Corridor to control subdivision near National Grid transmission lines, a National Grid Yard to control land uses and earthworks, and a National Grid Substation Corridor to manage activities adjacent to substations. The National Grid Subdivision Corridor has a variable width along each span based on line swing and the 22.5m radius around structures, and the National Grid Yard is an area 12m either side of the centre line of any National Grid line. These areas are shown on the planning maps (see extent of existing National Grid Corridor Overlay in Figure 7). There is also a National Grid Substation Corridor within the overlay around the periphery of substations. This exists around the periphery of the Drury Substation but needs a minor alteration as a consequence of changing the transmission line alignment.
- 2.2.2 The National Grid Yard is subclassified into National Grid Yard **Compromised**, and National Grid Yard **Uncompromised**, which was determined at the time the overlay was included in the AUP by an assessment of the extent of existing development under the transmission line spans. The existing and proposed spans subject to this Plan Change request are *Uncompromised* as the underlying areas have not been developed for urban purposes. The relevant provisions for the National Grid Corridor Overlay are included in Chapter D26 of the AUP. There are more planning restrictions on land uses under *Uncompromised* spans.
- 2.2.3 The transmission line is being realigned between existing Towers 143 and 146 at the request and funding of the developer for the Drury South Precinct, so that land proposed for residential development can occur unencumbered by the existing transmission lines and the related planning restrictions. The National Grid Corridor Overlay needs to be applied to the new

alignment to protect it in the long-term from the activities of other parties, particularly as land is on-sold as it is developed. Easements in favour of Transpower are already in place over parts of the new alignment that have already been vested to Auckland Council for stormwater management, and over riparian areas around the Hingaia Stream managed by the Department of Conservation. The width of the National Grid Subdivision Corridor and National Grid Yard will reflect how these are already shown on the AUP maps for the existing alignment and modelled maximum line swing on the new spans.

- 2.2.4 The National Grid Subdivision Corridor and National Grid Yard can be removed from the planning maps for the existing spans once the existing alignment has been dismantled. Removal of the overlay where transmission lines have been removed can occur without a plan change on written request by Transpower<sup>1</sup>.
- 2.2.5 Once approved, Transpower will advise in writing when the new overlays should be shown on the planning maps and have effect, and the old mapped overlays removed, so this occurs in an orderly manner when the new line is commissioned. GIS shape files will be provided by Transpower when the Council requires these for map updates.
- 2.2.6 Aside from changes to the maps to reflect the changed alignment, no other changes to the AUP are required.

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<sup>1</sup> See D26.4, paragraph 6 of the AUP

### 3 Description and background of the plan change

#### 3.1 Background

- 3.1.1 The Drury South area is transitioning from rural to urban following urban zonings being introduced to the AUP. This includes the land being developed by Drury South Limited for residential purposes under the existing alignment between Towers 143 and 146.
- 3.1.2 Drury South Limited are funding relocation of the transmission line to a location more compatible with the development concept for the area. The proposed new alignment in Drury South Residential Precinct - Sub Precinct B and the periphery of some business zones better provides for the land use strategy in the area. This removes transmission lines from Sub Precinct A to enable that area to be fully developed for residential purposes, whilst aligning the transmission line within an area proposed for passive recreation and green infrastructure. Proposed Plan Change 120 does not change the zoning Pattern for the project area.

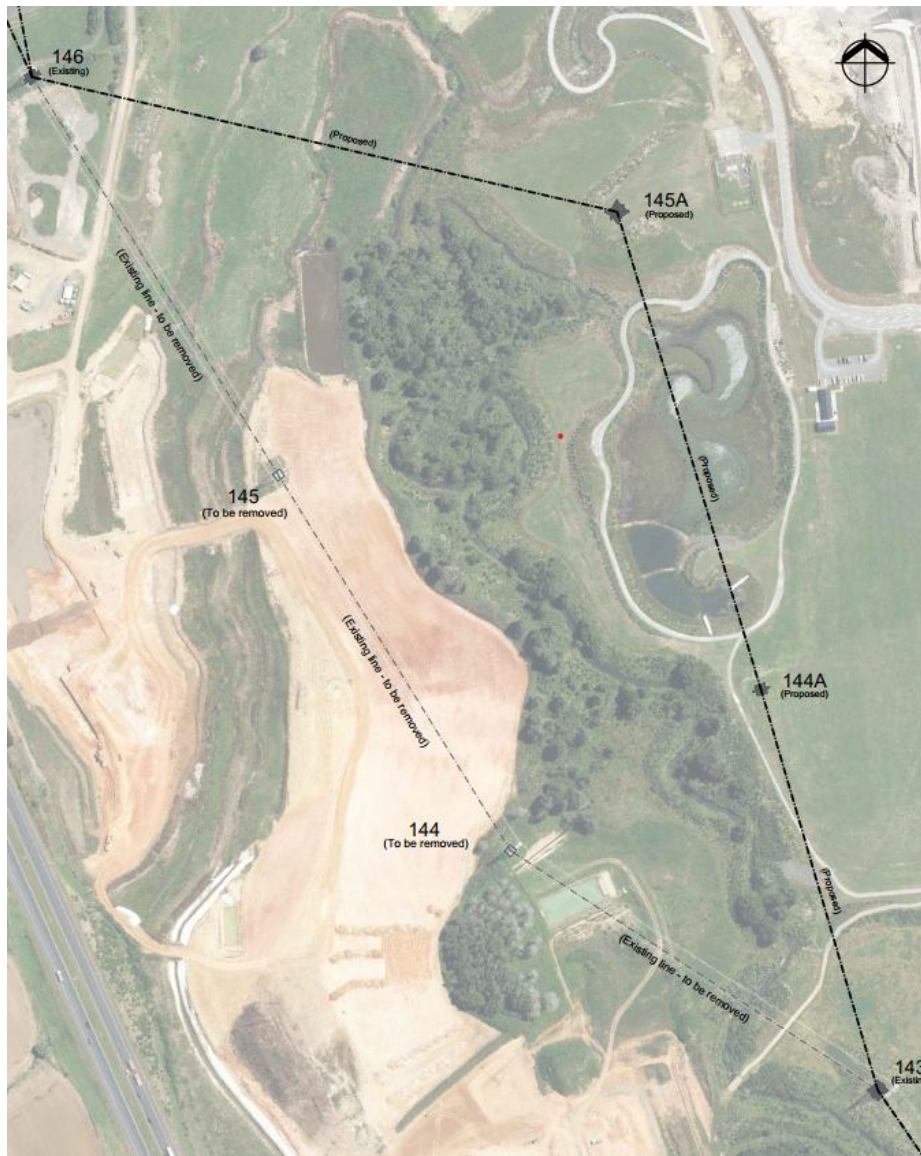


Figure 6: Overview of Existing and Proposed Alignment

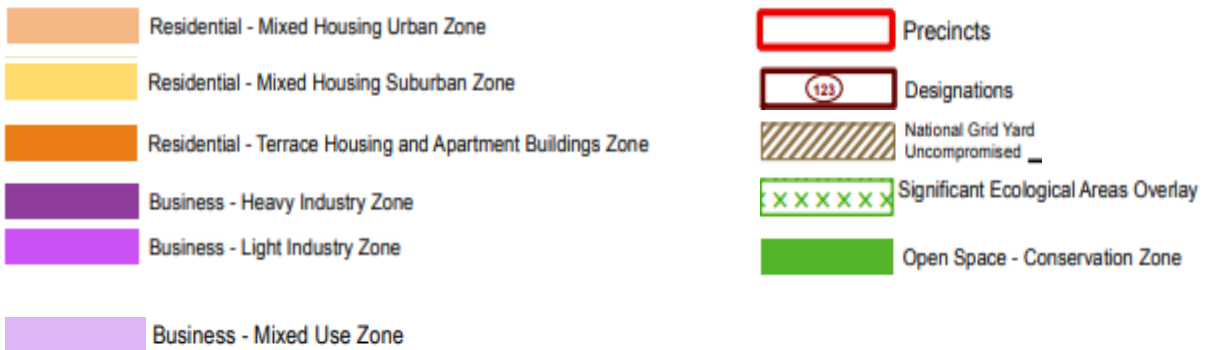
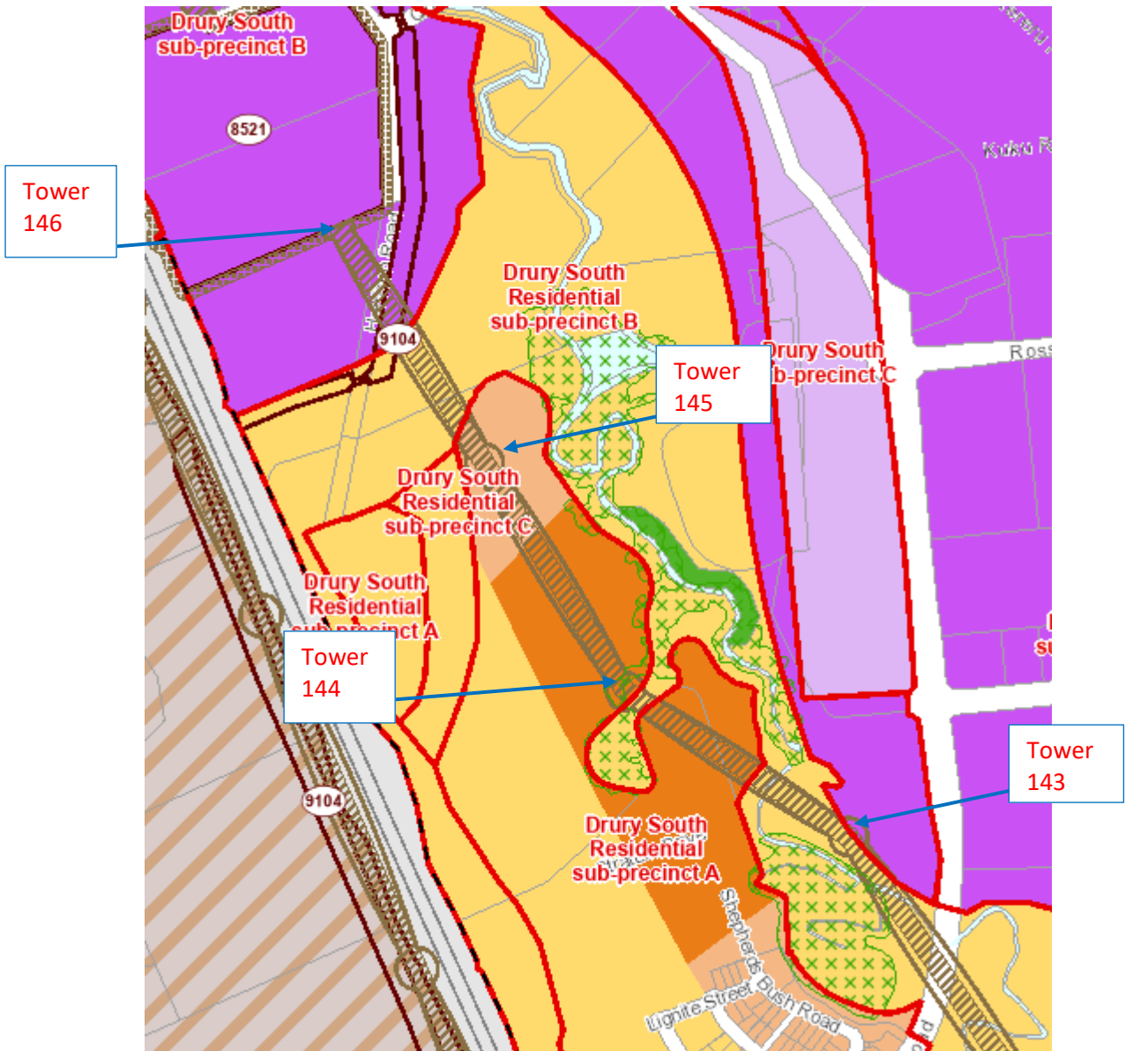


Figure 7: AUP Zoning and Overlays Context (Operative)

3.1.3 Under Proposed Plan Change 120, a small area of Residential – Terrace Housing and Apartment Zone under the existing line is rezoned to Residential – Single House Zone. There are no zone changes under the new alignment. The overall project area is identified as a spatially identified Qualifying Matter and/or Planning Matter – *Comprehensive Integrated Planning Outcome*. Comprehensive planning is achieved via the Drury South Precinct Plan.

## **3.2 Current AUP District Plan Provisions**

3.2.1 The AUP provisions relevant to this Plan Change included in Chapter D26 are summarised below.

3.2.2 As set out in Chapter D26, the purpose of the National Grid Corridor Overlay is to manage sensitive activities and potentially incompatible development (including land disturbance) within close proximity to the National Grid in order to:

- prevent risks to people and property;
- protect the National Grid;
- preserve line access for inspection and maintenance;
- preserve a corridor for the operation, maintenance, upgrade and development of National Grid infrastructure; and
- manage potential reverse sensitivity effects.

3.2.3 Chapter D26 contains a single objective as follows:

### ***D26.2. Objective [rcp/dp]***

*(1) The efficient development, operation, maintenance and upgrading of the National Grid is not compromised by subdivision, use and development.*

3.2.4 This objective is implemented by a number of policies and rules.

3.2.5 The objective and related provisions are annotated as district plan and regional coastal plan provisions in the AUP. The relevant spans are not in the CMA so for the purposes of this plan change the mapping changes only affects the district plan part of the AUP.

3.2.6 No changes to the objective, policies or rules are proposed. The Plan Change only proposes mapping changes to reflect the changed alignment. Once the new mapping is in place, the existing policy and rules framework will be engaged.

3.2.7 There are no proposed changes to the objective, policies or rules in D26 under Proposed Plan Change 120.

### **3.3 Description and scope of the changes proposed**

- 3.3.1 As previously outlined, the Plan Change does not propose any changes to the objectives, policies, or rules of the AUP.
- 3.3.2 The changes to the maps are shown on the plans in Appendix 1.
- 3.3.3 Transpower requests that the Plan Change is not decided until the resource consent to realign the transmission line is approved, and that the mapping changes do not take effect until advised in writing by Transpower to ensure it only has effect once the new line is commissioned and old one is redundant.

### **3.4 Stakeholder Engagement**

- 3.4.1 A Transpower representative attended a joint onsite meeting with Auckland Council representatives to undertake a project briefing as part of the pre-application process in 2019, and following a period of the project going on hold undertook an online pre-application meeting in regard to the resource consent application and Plan Change request in March 2025.
- 3.4.2 Transpower has worked closely with Drury South Limited over this proposal. Easements are in place for the parts of land already vested in Auckland Council for stormwater management purposes and will be in place for all Drury South Limited land before it is on-sold to other parties.
- 3.4.3 Easements are in place for land on the margins of the Hingaia Stream managed by the Department of Conservation.
- 3.4.4 Transpower has consulted New Zealand Transport Agency (NZTA), First Gas and Auckland Transport in regard to their existing and proposed assets to be crossed by the proposed realignment for which resource consent is required.
- 3.4.5 The existing and proposed transmission line alignments cross in air space over NZTA's Notice of Requirement (NoR) 5 Papakura to Bombay Phase 2 Project which involves an interchange connecting road running along southern side of the Transpower designation. Transpower's designers have worked with NZTA's consultants for the road project and have designed the span crossing NoR 5 using NZTA's PLS-CADD model to ensure minimum clearances over the future road surface are met. Written requiring authority approval from NZTA for the physical realignment work is included in the resource consent package. The current requirement, and the designation once confirmed, will take precedence over the overlay provisions.
- 3.4.6 Information on the project has been provided to First Gas in regard to their designation running adjacent to Harrison Road. They have provided written approval under s.176 of the RMA in regard to the physical realignment work (included in resource consent application package). The designation takes precedence over the overlay provisions.
- 3.4.7 The existing and proposed alignments of the transmission line cross Harrison Road in airspace. Auckland Transport has confirmed that they have no objection to the realignment project. The overlay restrictions on the road reserve will be the same as those to be removed over the same road from the existing alignment.

### **3.5 Consultation with iwi authorities**

- 3.5.1 Transpower has undertaken consultation with mana whenua in regard to the realignment project itself.
- 3.5.2 Transpower approached all mana whenua who have a recorded interest in the area on the Auckland Council website, and this resulted in Ngāti Tamaoho, Ngāti Te Ata, Ngāi Tai ki Tāmaki, and Ngāti Whanaunga indicating an interest in the project and requesting further consultation. Transpower and their representatives have had on-site meetings with representatives of Ngāti Tamaoho, Ngāti Te Ata and Ngāi Tai ki Tāmaki, and an off-site meeting with Ngāti Whanaunga. A draft copy of this AEE initially prepared in 2019 was provided to these parties for review and comment.
- 3.5.3 An outcome agreed as part of that engagement was that totara trees requiring removal will be offered to Ngāti Tamaoho for cultural use and the opportunity provided for karakia to be undertaken before their removal. These matters are relevant to the resource consent application.
- 3.5.4 No other specific cultural issues were raised in regard to the proposed Transpower works.
- 3.5.5 Given the intervening period where the project was on hold and design changes undertaken, Transpower has re-engaged with mana whenua who confirmed an interest to Transpower in the original round of engagement. Ngāti Te Ata provided further feedback and matters relevant to the physical realignment project in regard to matters such as the cultural landscape, tree removal/mitigation, monitoring, site blessing, induction and procurement which will be addressed through that process.
- 3.5.6 The Plan Change itself is to manage the effects of activities in and around the transmission lines and not to enable construction of the realignment and its associated effects. None of this land is owned by mana whenua groups.

## **4 Scale and significance evaluation**

### **4.1 The degree of shift in the provisions**

- 4.1.1 The level of detail in the evaluation of the proposal has been determined by the degree of shift of the proposed provisions from the status quo and the scale of effects anticipated from the proposal.
- 4.1.2 The degree of shift is minor in that there are no changes to the objectives, policies and rules of the AUP. The Plan Change is simply to apply provisions relevant to existing transmission lines to a new alignment undertaken at the request of the underlying land developer. The changes will also ensure alignment with the NPSET is achieved.

### **4.2 Scale and significance of effects**

- 4.2.1 The scale and significance of the likely effects anticipated from the implementation of the proposal has also been evaluated and regard has been given to whether the changes to the provisions:

- a. will result in effects that have been considered, implicitly or explicitly, by higher order documents, and the objective and policies for the National Grid Corridor Overlay in the AUP;
- b. remove any uncertainty from the current provisions;
- c. contribute to effective and efficient electricity transmission;
- d. will have positive effects including impacts on social, cultural and economic outcomes;
- e. will not impose significant costs on individuals or communities;
- f. represent a well-tested approach and certain benefits and costs.

4.2.2 The scale and significance of the effects are considered to be within the scale of effects anticipated by the AUP and the expectation of the underlying developer in requesting realignment of the transmission line. All affected land holdings other than a public road crossing and the margins and bed of the Hingaia Stream are either owned by Drury South Limited, or land vested with Auckland Council as part of the development that has easements for the proposed transmission line in place.

## 5 Evaluation of the proposal

### 5.1 Statutory evaluation

5.1.1 A change to a district plan should be designed to accord with sections 74 and 75 of the Act to assist the territorial authority to carry out its functions, as described in s31, so as to achieve the purpose of the Act. The aim of the analysis in this section of the report is to evaluate whether and/or to what extent the proposed Plan Change meets the applicable statutory requirements, including the District Plan objectives. The relevant higher order documents and their directions are outlined in Section 2.1 of this report. Section 3.2 above sets out the policy framework provided by Chapter D26 of the AUP.

### 5.2 Evaluation of the purpose of the plan change

5.2.1 Section 32 requires an evaluation of the extent to which the objectives<sup>2</sup> of the proposal are the most appropriate way to achieve the purpose of the Act (s32(1)(a)).

5.2.2 Objective D26.2 gives effect to the NPSET and AUP RPS provisions through requiring that the efficient development, operation, maintenance, and upgrading of the National Grid is not compromised by subdivision, use and development. The AUP implements this objective through the existing National Grid Corridor Overlay provisions, the mapped extent of which will be relocated on the planning maps to match the new alignment of the HLY-OTA A transmission line at Drury South.

5.2.3 The existing objective of the AUP in Chapter D26 is not proposed to be altered or added to by this Plan Change. This section of the report therefore evaluates the extent to which the purpose of the Plan Change (s32(6)(b)) is the most appropriate way to achieve the purpose of the Act (s32(1)(a)).

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<sup>2</sup> Section 32(6) defines "objectives" and "proposal" in terms specific to sections 32 – 32A. "Objectives" are defined as meaning:

- (a) for a proposal that contains or states objectives, those objectives;
- (b) for all other proposals, the purpose of the proposal.

5.2.4 The following table provides an evaluation of the purpose of the proposed Plan Change as well as the alternative of retaining the status quo to establish which is the most appropriate way to achieve the purpose of the Act (s32(1)(a) and s32(6)(b)).

Purpose of the proposal	Summary of Evaluation
<p><b>Purpose of the Plan Change as proposed:</b></p> <p>Relocate <i>National Grid Corridor Overlay</i> to the new alignment of the HLY-OTA A transmission line to ensure its ongoing protection from subdivision, use and development.</p>	<p>a. The intent of the Plan Change is to amend the planning maps to ensure the <i>National Grid Yard</i> and <i>National Grid Subdivision Corridor</i> are applied to the new alignment of the transmission line.</p> <p>b. This is consistent with the NPSET and is consistent with the AUP RPS level objectives and policies regarding ensuring Infrastructure is resilient, efficient and effective and protecting it from the adverse effects of other activities.</p> <p>c. This is consistent with AUP Objective D26.2 as it will provide for the efficient development, operation, maintenance and upgrade of the new transmission line alignment by including a buffer corridor and applying the associated provisions in the District Plan to protect this alignment from any adverse effects from third parties.</p> <p>d. The Proposal is consistent with Policy D26.3 which implement the objective by including provisions that require subdivision, use and development within the National Grid Corridor Overlay to be undertaken so that it:</p> <ul style="list-style-type: none"> <li>• meets the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001);</li> <li>• does not compromise security of supply and/or the integrity of National Grid assets;</li> <li>• does not compromise ongoing access to conductors and support structures for maintenance and upgrading works;</li> <li>• does not foreclose operation and maintenance options or the carrying out of planned upgrade works;</li> <li>• manages all activities to avoid exposure to health and safety risk from the National Grid;</li> <li>• manages activities sensitive to the National Grid to minimise exposure to nuisance, such as noise and line drip from the National Grid;</li> <li>• avoids the establishment or expansion of activities sensitive to transmission lines in the National Grid Yard;</li> <li>• avoids new structures and buildings within the National Grid Yard (Uncompromised), except for</li> </ul>

	<p>buildings for low intensity rural activities and minor structures; and</p> <ul style="list-style-type: none"> <li>• limits, as far as practicable, potential reverse sensitivity effects.</li> </ul> <p>e. Recognise the local, regional, and national benefits of the transmission line, support the effective operation, maintenance and upgrading of the electricity transmission network, and recognise technical and operational requirements through sizing the outer extent of the corridor based on line swing and the zone of influence in regard to access and EPR risk around structures, and risks around the periphery of substations through a minor update to the substation corridor.</p> <p>f. The buffer corridor mechanism already exists in the District Plan and is simply being relocated to reflect a new alignment due to a location shift of the transmission line requested and funded by the landowner.</p> <p>The proposed Plan Change (in the context of Part 2 matters):</p> <p>g. In regard to Section 5, the proposal promotes the sustainable management of natural and physical resources by ensuring protection of the nationally significant National Grid electricity transmission network (recognised by the NPSET) which is a significant physical resource. The benefits of an efficient and resilient transmission network will enable people and communities to provide for their social, economic and cultural wellbeing, and their health and safety. At the same time, adverse effects will be avoided, remedied, or mitigated by ensuring the activities of third parties do not compromise the operation of the transmission line or place third parties at undue risk from their activities near transmission lines and substations.</p> <p>h. Section 6 lists Matters of National Importance which need to be recognised and provided for in achieving the purpose of the Act. None of these apply to the subject matter of the Plan Change.</p> <p>i. Section 7 lists certain other matters to have regard to in achieving the purpose of the Act. Section 7(b) relates to the efficient use and development of natural and physical resources. The Plan Change will enable the efficient development, operation, maintenance, repair and upgrading of the transmission line once relocated.</p> <p>j. No specific Treaty issues under s8 have been identified.</p>
<p><b>Alternative purpose - Retain status quo/ No changes to provisions</b></p>	<p>a. The status quo would mean whilst the National Grid Corridor Overlay would be removed from the old alignment of the HLY-OTA A transmission line, there would be no equivalent AUP protection on the new alignment. This would not give effect to the NPSET</p>

<p>Do not show the National Grid Corridor Overlay over the new alignment of the HLY-OTA A transmission line.</p>	<p>requirements for buffer corridors in district plans. Whilst there are or will be easements in place, identifying the alignment on the planning maps will ensure that all district plan users, including future owners or lessees of affected land, are aware of the corresponding restrictions as set out under Chapter D26 of the AUP.</p> <p>b. The status quo is inconsistent with the objective and policies of D26 in the AUP providing no planning protection to the new transmission line alignment from the activities of other parties.</p> <p>Retaining the status quo (in the context of Part 2 matters):</p> <p>c. Results in no AUP rules to protect the transmission line from the adverse effects of third-party activity, which is inconsistent with s5 and 7(b) in regard to the sustainable management of a nationally significant physical resource.</p>
<p><b>Summary of evaluation:</b></p> <p>Overall, the proposal to relocate the extent of the <i>National Grid Corridor Overlay</i> is the most consistent option the AUP and higher order directions and will be efficient and effective in achieving them.</p>	

5.2.5 The above analysis indicates that the purpose of the Plan Change is consistent with/implements AUP Objectives D26.2 and higher order directions. Retaining the status quo would not implement the relevant objectives and would not achieve the purpose of the Act.

5.2.6 It is, therefore, considered that the purpose of the Plan Change is the most appropriate way to achieve the purpose of the Act.

### 5.3 Reasonably practicable options for provisions

5.3.1 In establishing the most appropriate provisions for the proposal to achieve the purpose of the Plan Change, reasonably practicable options for provisions were identified and evaluated.

5.3.2 In considering reasonably practicable options for achieving the objectives of the AUP and the relevant higher order directions, the following options for the District Plan provisions of the AUP have been identified. Taking into account the environmental, economic, social and cultural effects, the options identified were assessed in terms of their benefits, and costs. Based on that, the overall efficiency and effectiveness of the alternative options was assessed.

5.3.3 **Option 1** – Status quo

5.3.4 The status quo would not relocate the National Grid Corridor Overlay onto the new transmission line alignment.

5.3.5 **Option 2** – Relocate the National Grid Corridor Overlay onto the new alignment

5.3.6 This option would alter the planning maps such that the National Grid Corridor Overlay is relocated onto the new alignment of the HLY-OTA A transmission line and reinstated on a small area around the Drury Substation.

5.3.7 No change to the policies and rules of the District Plan are required.

## 5.4 Evaluation of options for provisions

5.4.1 The alternative options identified have been considered in terms of the potential costs and benefits and overall appropriateness in achieving the objectives of the AUP and the relevant directions of the higher order documents.

5.4.2 The table below summarises the assessment of costs and benefits for the alternative options based on their anticipated environmental, economic, social, and cultural effects.

5.4.3 The overall effectiveness and efficiency of each option have been evaluated, as well as the risks of acting or not acting.

### 5.4.4 Option 1 - Status quo

Benefits	Appropriateness in achieving the objectives/ higher order document directions
Environmental: <ul style="list-style-type: none"> <li>N/A</li> </ul>	<b>Efficiency</b> Maintaining the status quo is not efficient as it provides no AUP planning protection to the new alignment of the HLY-OTA A transmission line which may have negative consequences for its long-term development, operation, maintenance and upgrading, as well as on the health and safety and amenity of people and communities.  The costs are considered to outweigh the benefits and therefore this option is considered to be inefficient.
Economic: <ul style="list-style-type: none"> <li>Does not impose planning constraints on the owner and occupier of the underlying land (new alignment).</li> </ul>	
Social: <ul style="list-style-type: none"> <li>N/A</li> </ul>	
Cultural: <ul style="list-style-type: none"> <li>N/A</li> </ul>	
<b>Costs</b>	
Environmental: <ul style="list-style-type: none"> <li>N/A</li> </ul>	<b>Effectiveness</b> Maintaining the status quo is considered to be inconsistent with the objectives and policies of the AUP and higher order planning instruments and is therefore not effective in implementing these.
Economic: <ul style="list-style-type: none"> <li>Impacts on the development, operation, maintenance and upgrading of the transmission line could adversely affect the wider regional and national economy.</li> <li>Whilst there are constraints on the underlying landowner, these are on an equivalent footprint to existing or proposed easements for rh transmission line and in an area where residential development is not proposed.</li> </ul>	
Social: <ul style="list-style-type: none"> <li>Buffer corridor provisions help protect the health and safety and amenity of people and communities.</li> </ul>	
Cultural:	

<ul style="list-style-type: none"> <li>N/A</li> </ul>	
<b>Risk<sup>3</sup> of acting/not acting</b> The risk of not acting by retaining the status quo is that it does not give effect to the objectives of the AUP and higher order planning instruments, and results in no rules framework to protect the transmission line in the AUP or for a small area around the substation.	
<b>Recommendation:</b> This option is not recommended as the costs are assessed as outweighing the benefits. It is not considered to provide for substantiable management of natural and physical resources in an efficient and effective matter.	

5.4.5 **Option 2** - Relocate the National Grid Corridor Overlay onto the new alignment

Benefits	Appropriateness in achieving the objectives/ higher order document directions
Environmental: <ul style="list-style-type: none"> <li>N/A</li> </ul>	<b>Efficiency:</b> There is already a suitable AUP policy and rules framework which will apply once the maps are updated, so it is an efficient means of providing suitable protections in the AUP to the realigned transmission line and line interface to the substation.  <b>Effectiveness:</b> The changes directly implement the directives of the higher-level planning instruments to provide protection to existing National Grid transmission lines and substations, and AUP Objective D26.2
Economic: <ul style="list-style-type: none"> <li>Provides AUP planning protection for the development, operation, maintenance and upgrading of a regionally and nationally significant physical resource that benefits the wider economy.</li> <li>The constraints are in areas where residential development is not proposed, and removal of the existing transmission line and associated overlay frees up that land for urban development unencumbered by the existing transmission line.</li> </ul>	
Social: <ul style="list-style-type: none"> <li>Assists with the protecting the health and safety and amenity of people and communities by keeping incompatible activities away from transmission lines and substations.</li> </ul>	
Cultural: <ul style="list-style-type: none"> <li>N/A</li> </ul>	
<b>Costs</b>	
Environmental: <ul style="list-style-type: none"> <li>N/A</li> </ul>	
Economic: <ul style="list-style-type: none"> <li>Whilst there are constraints on the underlying landowners, these are on an</li> </ul>	

<sup>3</sup> Risk is the likelihood or probability of an effect and the cost of the consequence occurring = 'likelihood times consequence'.

<p>equivalent footprint of existing easements for land not controlled by Drury South Limited. For Drury South Limited land holdings, the new alignment is where they have requested it.</p>	
<p>Social:</p> <ul style="list-style-type: none"> <li>• N/A</li> </ul>	
<p>Cultural:</p> <ul style="list-style-type: none"> <li>• N/A</li> </ul>	
<p><b>Risk of acting/not acting</b></p> <p><u>Not Acting</u></p> <p>The risk of not acting by retaining the status quo (Option 1) is that it does not give effect to the objectives of the AUP and higher order planning instruments. This results in full reliance on easements without any direct AUP protection for the transmission line. A minor gap in the substation corridor would also result. Third parties and the Council may not necessarily be aware of the easement controls if there are no clear provisions in the AUP. Easements also do not apply to the crossing of public roads or the bed of the Hingaia Stream.</p> <p><u>Acting</u></p> <p>The existing AUP corridor provisions are well understood within the Auckland Council area and other territorial and unitary authority jurisdictions and can easily be implemented to provide strong protections for the transmission line and substation consistent with the relevant planning framework.</p> <p><b>Recommendation:</b></p> <p>This option is recommended as being the most appropriate option. The benefits are considered to outweigh the costs. It is considered to better achieve the objectives of the AUP and higher order planning instruments than the status quo option. Accordingly, this is considered to provide for the substantiable management of natural and physical resources in an efficient and effective matter.</p>	

## 6 Limited Notification

- 6.1.1 Clause 5A of the First Schedule provides the option to give limited notification of a proposed plan change. The new location of the National Grid Corridor Overlay will only affect the land holdings (outside of roads) of Drury South Limited and land where there are already easements in place in favour of Transpower (e.g. land vested now vested in Auckland Council as part of the underlying development and the Department of Conservation who has entered into easements in riparian areas of the Hingaia Stream).
- 6.1.2 Any effects in airspace over Harrison Road and network utility services in this road are considered to be neutral as equivalent provisions will be removed from the existing alignment when dismantled.
- 6.1.3 The designation for First Gas and requirement of NZTA (awaiting resolution of appeals to become a designation) have priority over the restrictions of the proposed overlay. Furthermore, First Gas and NZTA have provided written approvals for the physical works project to construct the transmission line on the new alignment.

- 6.1.4 Limited notification to Drury South Limited, Department of Conservation, First Gas and NZTA is requested due to their landowner and designation interests in the project. In regard to land vested in Auckland Council, Transpower considers that this matter can be addressed by internal departmental comment as part of this Plan Change process.

## 7 Conclusions

- 7.1.1 This report highlights the need to relocate the National Grid Corridor Overlay onto the new alignment of the HLY-OTA A transmission line at Drury South to ensure suitable AUP protection is in place for the transmission line. This aligns with the directions set by the higher order planning framework and the objectives and process of the AUP.
- 7.1.2 The report has reviewed and considered all relevant matters under s32 of the Act. Limited notification to the parties (other than Auckland Council) affected by the footprint and associated restrictions of the National Grid Corridor Overlay is sought.
- 7.1.3 The information including any appendices in this report presents a comprehensive picture of all relevant information required to enable the proposed Plan Change to be considered. In addition, this information is at a level of detail that is appropriate to the scale and significance of the issue being addressed.

-

## APPENDIX 1 – REQUESTED CHANGES TO DISTRICT PLAN

**Legend**

**Transpower Assets**

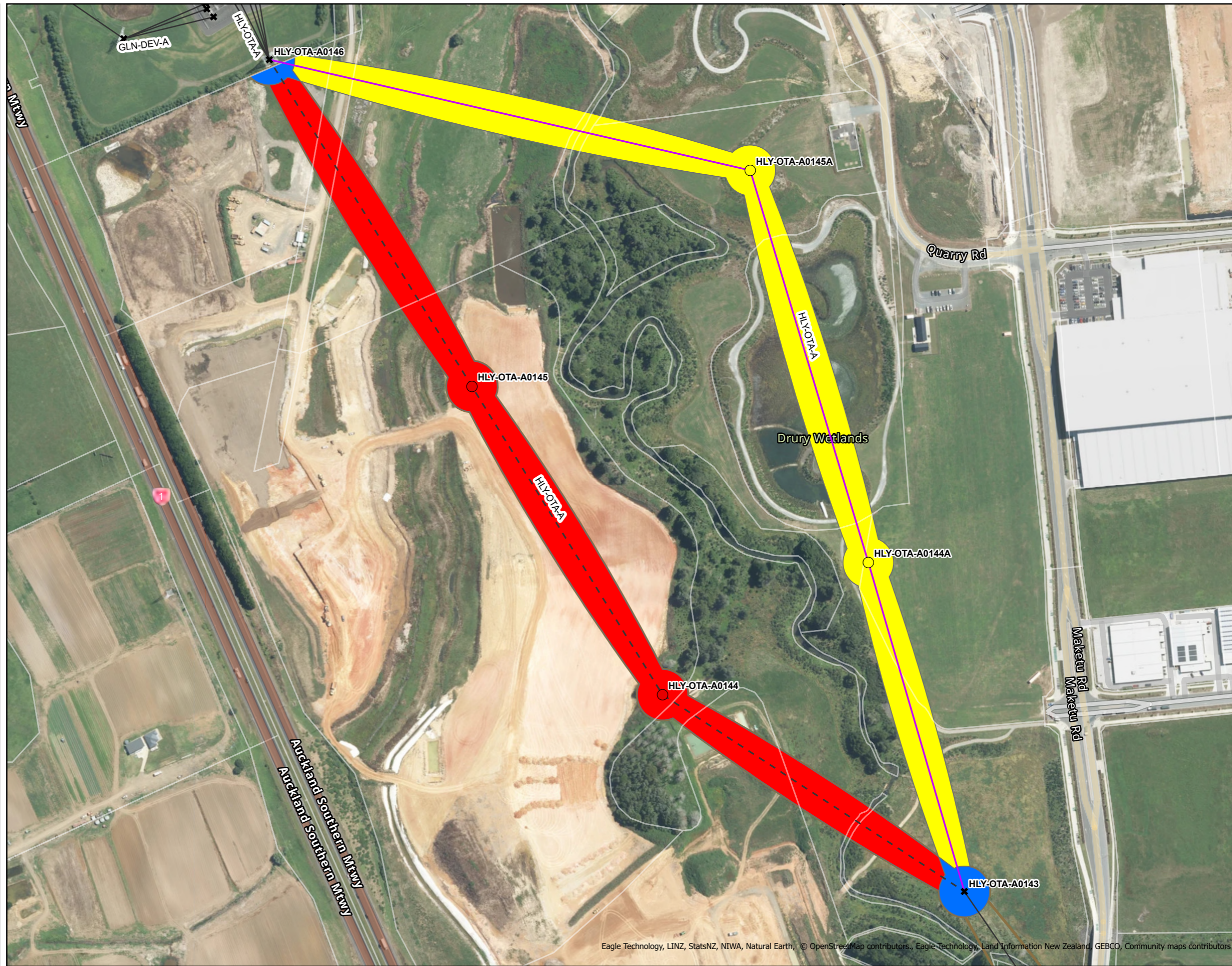
- New structures
- Remove structures
- ✖ Other structures
- New transmission line section
- Remove transmission line section
- Other transmission line

**National Grid Corridor Overlay Updates**

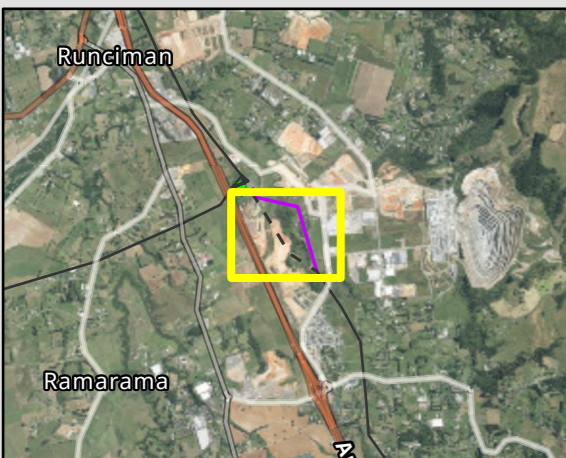
- Add to the National Grid Subdivision Corridor
- National Grid Subdivision Corridor to remain
- Remove from National Grid Subdivision Corridor

**Existing National Grid Corridor Overlay**

- National Grid Subdivision Corridor
- Parcel boundary



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**External**

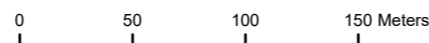
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Prepared by: Geospatial Team

**Huntly - Otahuhu A Line Realignment  
National Grid Subdivision Corridor Overlay**



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Date: 22/10/2025 Drawn by: aldrichh

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**Legend**

**Transpower Assets**

- New structures
- Remove structures
- ✖ Other structures
- New transmission line section
- - - Remove transmission line section
- Other transmission line

**National Grid Corridor Overlay Updates**

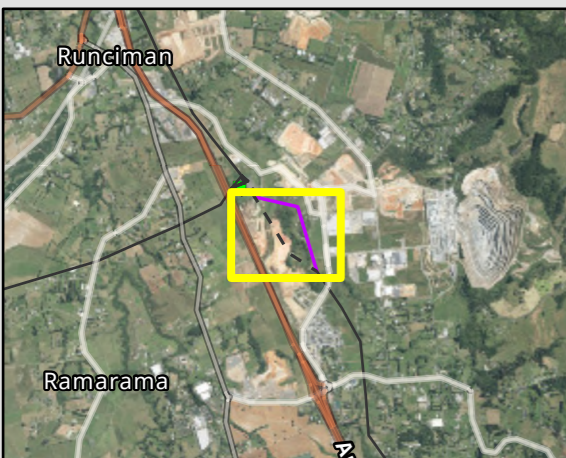
- Add to the National Grid Yard Uncompromised
- National Grid Yard Uncompromised to remain
- Remove from National Grid Yard Uncompromised

**Existing National Grid Corridor Overlay**

- National Grid Yard Uncompromised
- Parcel boundary



Page 1 of 1



**External**

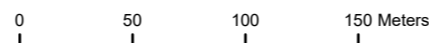
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**Huntly - Otahuhu A Line Realignment  
National Grid Yard Overlay**



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**Legend**



**Transpower Assets**

- \* Other structures
- New transmission line section
- - - Remove transmission line section
- Other transmission line

**National Grid Corridor Overlay Updates**

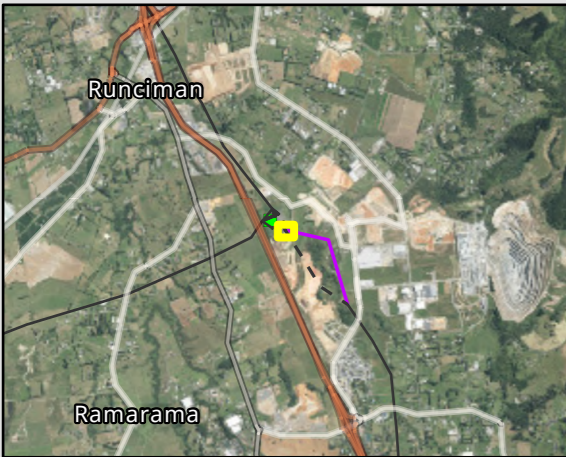
- Add to the National Grid Substation Corridor

**Existing National Grid Corridor Overlay**

- National Grid Substation Corridor
- Parcel boundary



Page 1 of 1



**External**

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**Huntly - Otahuhu A Line Realignment  
National Grid Substation Corridor Overlay**



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Date: 22/10/2025 Drawn by: aldrichh

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Projection: NZTM 2000 Scale: 1:500