

# SUBMISSION ON

## National Policy Statement for Electricity Networks

25 July 2025

**To:** Ministry for the Environment

**Name of Submitter:** Horticulture New Zealand

**Supported by:** Pukekohe Vegetable Growers Association. Hawkes Bay Vegetable Growers Association, NZ Apples and Pears

### Contact for Service:

Sarah Cameron  
Senior Policy Advisor  
Horticulture New Zealand  
PO Box 10-232 WELLINGTON  
Ph: 021446281  
Email: [sarah.cameron@hortnz.co.nz](mailto:sarah.cameron@hortnz.co.nz)

# OVERVIEW

## Submission structure

- 1 Part 1: HortNZ's Role
- 2 Part 2: Executive Summary
- 3 Part 3: Submission

---

## Our submission

Horticulture New Zealand (HortNZ) thanks the Ministry for the Environment (MfE) for the opportunity to submit on the National Policy Statement for Electricity Networks and welcomes any opportunity to continue to work with MfE to discuss our submission.

HortNZ wishes to be heard in support of our submission and would be prepared to consider presenting our submission in a joint case with others making a similar submission at any hearing.

The details of HortNZ's submission and decisions we are seeking are set out in our submission below.

# HortNZ's Role

## Background to HortNZ

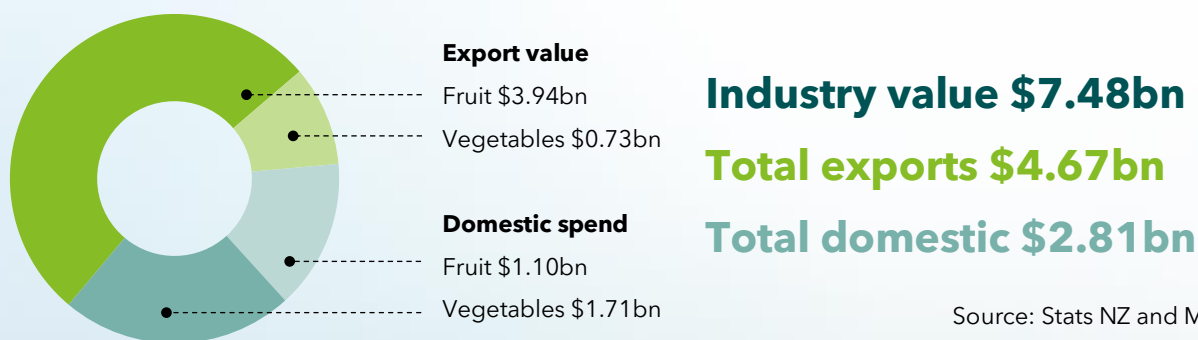
HortNZ represents the interests of approximately 4,500 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruits and vegetables. The horticultural sector provides over 40,000 jobs.

There are approximately 80,000 hectares of land in New Zealand producing fruit and vegetables for domestic consumers and supplying our global trading partners with high quality food.

It is not just the direct economic benefits associated with horticultural production that are important. Horticulture production provides a platform for long term prosperity for communities, supports the growth of knowledge-intensive agri-tech and suppliers along the supply chain, and plays a key role in helping to achieve New Zealand's climate change objectives.

The horticulture sector plays an important role in food security for New Zealanders. Over 80% of vegetables grown are for the domestic market and many varieties of fruits are grown to serve the domestic market.

HortNZ's purpose is to create an enduring environment where growers prosper. This is done through enabling, promoting and advocating for growers in New Zealand.



## HortNZ's Resource Management Act 1991 Involvement

On behalf of its grower members HortNZ takes a detailed involvement in resource management planning processes around New Zealand. HortNZ works to raise growers' awareness of the Resource Management Act 1991 (RMA) to ensure effective grower involvement under the Act.

# Executive Summary

HortNZ supports the intent of the proposed amendments to the National Policy Statement on Electricity Transmission (to be renamed National Policy Statement for Electricity Networks NPSEN) to provide for a resilient, reliable, and nationally significant electricity network. Reliable electricity is essential to the horticulture sector for activities such as irrigation, frost protection, refrigeration and post-harvest processing, however, the implementation of the NPSEN must be carefully balanced with other national direction, particularly the National Policy Statement for Highly Productive Land (NPSHPL) to ensure the protection of highly productive land (HPL).

The widespread and localised nature of electricity distribution networks creates specific challenges for horticulture that the draft policy does not fully address. Distribution lines often run through horticultural operations and their impacts can reduce the flexibility and efficiency of horticultural operations.

HortNZ does not support applying national grid yard corridor provisions, which were designed for large-scale transmission lines, to distribution infrastructure. Unlike transmission assets, distribution networks are far more extensive and integrated into the working rural landscape. A one-size-fits-all approach would create unnecessary land use restrictions and could compromise the productive use of (HPL).

We also note that while the draft policy seeks to protect electricity infrastructure from reverse sensitivity, it does not provide the same level of protection for existing primary production activities from the effects of new or expanded electricity lines. A more balanced approach is needed—one that considers the impacts on primary production and land use flexibility alongside the needs of the electricity network.

To address the above issues, HortNZ recommends:

- Limiting **national grid yard provisions** to transmission infrastructure only. Distribution infrastructure should instead be managed through technical guidance such as NZECP 34:2001 (New Zealand Electrical Code of Practice for Electrical Safe Distances), to better reflect the diversity of rural contexts
- Aligning policy implementation with the **NPSHPL Clauses 3.5 and 3.6**, which require that HPL be protected and that nationally significant infrastructure be located on HPL only where there is a demonstrated operational or functional need, and no practicable alternative exists
- Requiring policy frameworks and decision-makers to consider the **cumulative effects** of electricity network infrastructure on primary production
- Strengthening objectives and policies to explicitly recognise the role of electricity networks in enabling land-based primary production
- Ensuring that the policy framework supports early and meaningful **engagement with landowners and industry stakeholders** when locating and designing new electricity infrastructure in rural areas.

# Submission

## 1. National Environment Standard Amendments to the National Policy Statement on Electricity Transmission 2008

### 1.1. Balancing Electricity Infrastructure and the Protection of Highly Productive Land

Horticulture is a nationally and regionally significant land use that contributes to food security, export earnings, and regional employment. It depends on access to reliable electricity infrastructure, particularly for irrigation, frost protection, refrigeration and packhouse operations. At the same time, horticultural operations require access to HPL and flexibility in land use arrangements, including the placement of crop protection structures and machinery movement. This means electricity networks and primary production must be managed in a way that recognises and supports both, given their shared importance to the rural economy.

The NPSHPL Clause 3.6(1) requires decision-makers to avoid the inappropriate use and development of highly productive land, and Clause 3.6(2) sets out that other land uses may only be located on HPL where it is demonstrated that:

- The use provides for the functional or operational needs of a regionally or nationally significant infrastructure activity (Clause 3.6(2)(a)), and
- The use cannot be reasonably located elsewhere while achieving the same outcome (Clause 3.6(2)(b)).

Accordingly, where electricity network infrastructure is proposed on or near HPL, decision-makers must demonstrate that the location is operationally or functionally necessary and that there are no practicable alternatives. Where such infrastructure is essential to rural production or national resilience, its development may be justified – but only where adverse effects on the productive capacity and functionality of the land are avoided where practicable, and otherwise minimised or mitigated, consistent with Clause 3.5 of the NPS-HPL.

This balanced approach aligns with the integrated management principles under section 5 of the RMA<sup>1</sup>, and supports the coordinated implementation of both national policy statements.

---

<sup>1</sup> <https://www.legislation.govt.nz/act/public/1991/0069/latest/DLM231905.html>

## 1.2. Proportionate Management of Electricity Networks: Transmission vs. Distribution

The National Grid Yard provisions were developed to manage safety and land use around high-voltage transmission infrastructure and are not appropriate or proportionate for application to electricity distribution networks.

The National Grid Yard provisions impose setbacks and restrict certain activities within designated corridors to protect critical national infrastructure and maintain transmission reliability. However, these provisions were designed for transmission lines that operate at very high voltages (e.g. 110kV and above).

In contrast, electricity distribution infrastructure is far more localised, lower in voltage, and more variable in design and location. Distribution lines often traverse rural environments. If National Grid Yard setbacks were applied to distribution assets, they would significantly limit the ability of landowners to make efficient use of their land.

HortNZ supports continued reliance on NZECP 34:2001 as the primary mechanism for managing the interface between distribution lines and land use. NZECP 34:2001 is a nationally accepted technical standard that sets out clear requirements for minimum safe distances between structures, vegetation, and power lines based on voltage, conductor type and activity type.

We submit that mapped corridor overlays and fixed setback provisions should be applied **only** to transmission infrastructure, and not to electricity distribution networks. This distinction would ensure that national electricity policy remains proportionate, targeted, and compatible with the practical needs of rural land users.

## 2. Discussion Questions

**Q. 1.1** Do you support the inclusion of electricity distribution within the scope of the NPSEN?

No. The National Grid Yard provisions establish setbacks and limit certain land use activities within designated corridors to safeguard critical national infrastructure and ensure the reliability of high-voltage transmission. However, these controls were specifically developed for transmission lines operating at very high voltages (typically 110kV and above).

Given the highly variable and locally embedded nature of electricity distribution networks, it is more appropriate that these be managed through performance-based standards and technical guidance (such as NZECP 34:2001).

**Q. 1.2** Are there risks that have not been identified?

The inclusion of electricity distribution in the NPSEN introduces specific risks that have not been fully addressed in the draft policy framework and does not currently require a strategic assessment of the land use impacts of distribution infrastructure, particularly on HPL.

Furthermore, while the policy places strong emphasis on avoiding reverse sensitivity effects that could constrain electricity infrastructure, it does not provide corresponding protections for established primary production from infrastructure encroachment. This creates a policy imbalance that risks prioritising new infrastructure development over existing rural production.

We recommend that the NPSen be amended to:

- Require consideration of the cumulative effects of distribution infrastructure on land-based primary production; and
- Include provisions that recognise and protect the operational needs and land use flexibility of existing rural activities, including horticulture, particularly on highly productive land.

#### Q. 1.3 Do you support the proposed definitions in the NPSen?

While HortNZ generally supports the inclusion of the definitions we have concerns about some definitions that may lead to unintended consequences if not refined, particularly in rural and productive land contexts.

In particular we recommend that the NPSen include or cross-reference the established definitions of HPL from the NPSHPL and ensure consistent interpretation between instruments. This is important to avoid overlap, conflict, or misapplication of policies where infrastructure intersects with rural land.

Further, we seek clarity around the definition of “**routine electricity network activities**”, which should be limited to maintenance and minor upgrades that do not materially increase the physical footprint or operational effects of existing infrastructure. This will help avoid misinterpretation and ensure that permitted activity status is only applied to genuinely low impact works.

#### Q. 1.4 Are there any changes you recommend to the NPSen?

Several changes are required to ensure that the NPSen is proportionate, well-targeted, and compatible with the NPSHPL:

1. The NPSen should explicitly require decision-makers to consider the purpose and policies of the NPSHPL when making decisions about the location and management of electricity infrastructure. This includes avoiding or minimising the loss of productive capacity on HPL and ensuring that land use flexibility is retained for future food and fibre production
2. The NPSen should include a policy requiring assessment of effects of electricity distribution infrastructure on land-based primary production, particularly on HPL.
3. National Grid Yard provisions be restricted to transmission infrastructure. Electricity distribution networks are more extensive and variable and should be managed via performance standards and technical guidance (e.g. NZECP 34:2001) rather than static corridor overlays

4. A policy requiring electricity network providers to engage with affected landowners and relevant rural industry representatives when planning new infrastructure or major upgrades. This will help to identify land use constraints early, support collaborative siting and design solutions, and minimise disruption to horticultural operations.

**Q. 1.5** Do you support the proposed objective?

We agree that the objective appropriately recognises the national significance of electricity infrastructure, its role in supporting energy resilience and security, and its contribution to New Zealand's emissions reduction and renewable energy targets.

The horticulture sector is a significant contributor to the food and fibre economy and relies on a secure and resilient electricity networks to support core production activities such as irrigation, refrigeration and post-harvest processing. We therefore support the objective's inclusion of long-term resilience and intergenerational wellbeing.

However, we recommend strengthening the objective's reference to managing adverse effects on the environment by specifically recognising the need to safeguard the productive capacity HPL. Infrastructure development should be planned and delivered in a manner that supports, rather than constrains, the long-term viability of primary production.

We also recommend clarifying that protecting electricity networks from the adverse effects of other activities should not unintentionally restrict established and compatible rural activities such as horticulture. The objective should reflect a balanced approach that enables the co-existence of electricity infrastructure and primary production.

**Q. 1.6** Will the proposed policy improve the consideration of the benefits of electricity networks in decision-making?

HortNZ supports the proposed strengthening of Policy 1 in the NPSEN to ensure decision-makers recognise and provide for the national, regional, and local benefits of electricity networks. We agree that the expanded policy appropriately reflects the essential role of electricity infrastructure in enabling emissions reduction, supporting energy security, and underpinning modern life, community functioning, and economic productivity.

However, we recommend that the policy be strengthened by explicitly recognising the role of electricity networks in supporting primary production and the effective use of HPL. This would help ensure that infrastructure planning and upgrades are understood as critical enablers of food and fibre production, and that policy implementation aligns with the objectives of the NPSHPL.

**Q. 1.7** Does the proposed policy sufficiently provide for the operational and functional needs for electricity networks to be located in particular environments?

HortNZ supports the intent of the proposed policy to recognise and provide for the operational and functional needs of electricity networks to be located in particular

environments. We agree that a clear national direction on this matter is appropriate and necessary to support the delivery of resilient infrastructure across both urban and rural areas.

However, we consider that the policy could be further improved by including a clear directive to balance operational need with the protection of primary production systems, particularly where electricity infrastructure is proposed on or near HPL. Without this, there is a risk that the policy could be interpreted as prioritising infrastructure delivery without due regard for the long-term productive capacity and flexibility of rural land uses.

We recommend that the policy explicitly acknowledge that the operational and functional need for electricity infrastructure must be assessed alongside the values identified in the NPSHPL and include guidance on how to avoid, minimise, or mitigate adverse effects on productive land. This would ensure a more balanced and integrated approach to infrastructure planning in rural environments.

**Q. 1.8** Do you support Transpower and electricity distribution businesses selecting the preferred route or sites for development of electricity networks?

HortNZ supports Transpower and electricity distribution businesses identifying the preferred route or site for electricity network development, provided that this occurs within a transparent planning framework that includes appropriate consultation with affected landowners and industry stakeholders.

However, we consider it essential that the selection of routes or sites is also informed by the potential effects on existing land uses, particularly on HPL.

We therefore recommend that the policy framework require infrastructure providers to engage early with affected rural landowners and to demonstrate how site and route selection has avoided or minimised adverse effects on HPL. This would help ensure that infrastructure and primary production can continue to coexist, and that the implementation of the NPS-EN aligns with the outcomes sought under the NPSHPL.

**Q. 1.9** Do you support the proposed policy to enable development of electricity networks in areas not protected by section 6 of the RMA, or covered by other national direction?

HortNZ supports, in principle, the proposed policy to enable the development of electricity networks in areas not protected by section 6 of the RMA or subject to other national direction. We agree that enabling infrastructure in less constrained environments is generally appropriate and can help avoid conflicts with areas of recognised natural and cultural value.

However, we submit that the policy must also explicitly recognise that many of these “unprotected” areas include HPL. While not listed under section 6 of the RMA, HPL warrants specific consideration due to its finite nature and essential role in New Zealand’s domestic food supply and export economy.

**Q. 1.10** Do the proposals cover all the matters that decision-makers should evaluate when considering and managing the effects of electricity network activities?

The proposed policy framework does not yet fully cover all the matters that should be evaluated by decision-makers – particularly in relation to primary production and the use of HPL.

In addition, the framework focuses heavily on enabling electricity networks and protecting them from reverse sensitivity but does not equally recognise or protect the operational requirements of established primary production from the effects of infrastructure encroachment. This imbalance could lead to outcomes that are contrary to the objectives of the NPSHPL.

**Q. 1.11** Do you support the proposed policy to enable routine works on existing electricity network infrastructure in any location or environment?

HortNZ supports, in principle, the proposed policy to enable routine works on existing electricity network infrastructure across all locations and environments. We recognise that timely maintenance, minor upgrades, and repair works are essential to ensuring the ongoing reliability and resilience of the electricity network, particularly in rural areas where horticultural operations rely on consistent power supply for irrigation, refrigeration, and post-harvest processing.

However, we recommend that the policy be clearly scoped to avoid unintended consequences. The term “routine works” should be clearly defined and limited to activities that do not materially increase the physical footprint or adverse effects of the existing infrastructure. This is important to avoid enabling incremental intensification or expansion under the guise of routine maintenance, particularly in sensitive rural environments.

**Q. 1.12** What other practical refinements to Policy 8 of the NPS-EN could help avoid adverse effects on outstanding natural landscapes, areas of high natural character, and areas of high recreation value and amenity in rural environments?

HortNZ supports the intent of Policy 8, to avoid adverse effects of electricity network infrastructure on outstanding natural landscapes, areas of high natural character, and areas of high recreation and amenity value in rural environments. However, we recommend several practical refinements to ensure that the policy is effective, balanced, and does not unintentionally restrict infrastructure delivery or rural land use inappropriately.

We suggest that the policy encourage the use of low-impact design, such as undergrounding in visually sensitive areas, the use of existing accessways, and the co-location of infrastructure where feasible, as a means of mitigating effects without requiring avoidance by location.

The policy should include an expectation for early engagement with local landowners, mana whenua, and community stakeholders to help identify values early in the site selection process where infrastructure is necessary in visually sensitive areas.

We recommend that the policy explicitly recognise the need to balance landscape and amenity protection with the operational and locational constraints of the electricity network and avoid displacing infrastructure onto HPL where this would result in greater or more permanent disruption to primary production.

**Q. 1.7** Should developers be required to consult with electricity distribution providers before a resource consent for land development is granted?

HortNZ supports, in principle, the requirement for developers to consult with electricity distribution providers before a resource consent for land development is granted. Early consultation can help ensure that new developments do not compromise existing electricity infrastructure, that network upgrades are planned in advance, and that reverse sensitivity effects are minimised. This is particularly important where developments are proposed near critical infrastructure or within electricity network corridors.

However, we recommend that this requirement be clearly targeted to situations where there is a genuine potential for conflict or constraint – for example, when development is proposed near high-voltage lines, substations, or within designated electricity corridors. A blanket requirement could result in unnecessary consultation for minor rural developments with no material effect on the network.

Additionally, we recommend that the consultation process include a reciprocal obligation: electricity distribution providers should also consider the operational needs of existing rural activities, particularly in areas of HPL. Developers of both urban and infrastructure projects should demonstrate how they have avoided or minimised impacts on productive rural land and land-based primary production systems, including horticulture.

### **3. Conclusion**

HortNZ supports the intent of the proposed NPSEN however, the policy must also be implemented in a way that gives effect to the NPSHPL and does not compromise the ongoing viability of primary production.

HPL is a finite national resource essential for food production, economic development, and climate resilience. The widespread and embedded nature of electricity distribution infrastructure presents unique risks to horticulture that are not fully addressed in the draft NPSEN. These include cumulative impacts on land use flexibility, production layout, and rural infrastructure.

We therefore submit that:

- National Grid Yard provisions should not be extended to distribution infrastructure, which is better managed through NZECP 34:2001
- The NPSEN should include clear requirements to avoid or minimise adverse effects on HPL and ensure that infrastructure is located on such land only where operationally necessary and where no practicable alternative exists

- Decision-makers must consider the effects of distribution infrastructure on primary production and ensure balanced protections for both electricity networks and existing rural land uses
- A more collaborative and transparent approach to route and site selection, including meaningful engagement with landowners and rural industries, is essential to avoid land use conflicts and maintain productive capacity.

By adopting a more balanced and proportionate policy approach, the NPSEN can enable critical electricity infrastructure while safeguarding New Zealand's food production systems and rural economies for future generations.