Submission in Support of Proposed Amendments to the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009

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Executive Summary

Drive Electric is New Zealand's leading, apolitical, not-for-profit organisation focused on accelerating the uptake of electric mobility across the country.

In existence since 2011, we currently have more than 70 members representing the electric mobility ecosystem – electricity generators and retailers; network businesses; auto distributors; fleet companies; charging providers; financial services; information technology companies; and other related businesses.

New Zealand's transport electrification depends critically on infrastructure deployment efficiency. EV drivers must have the confidence of a robust charging environment that suits their charging needs where and when they need it. In order to get there, we must streamline our infrastructure roll out to be efficient and cost-effective, therefore supporting Aorearoa's e-mobility uptake.

The Government's target of 10,000 public EV chargers by 2030 requires many of the barriers the industry faces while deploying EV Charging infrastructure to be removed. The introduction of new permitted activity standards for EV infrastructure and intent of provisions for the distribution network in particular help reduce some of these barriers.

We encourage Ministers to take note of feedback from Charge Point Operators and others involved in deploying EV charging infrastructure especially to:

- ensure the scope of permitted activities is broad enough to capture many of the typical locations for EV charging infrastructure
- expand definitions of EV charging infrastructure to include ancillary infrastructure commonly required for charging sites such as lighting, signage, weather protection structures, and site security equipment
- Ensure typical EV charging site activity such as maintenance and upgrades are included as permitted activity

We support the intent behind broadening the scope of the National Policy Statement on Electricity Transmission to include distribution networks, especially those driving a more permissive consenting environment for existing and new energy infrastructure that is required to support public and private transport electrification.

Key Areas of Support with Essential Modifications

1. Enhanced National Significance Recognition - Supporting e-Mobility Infrastructure

We support the proposed amendments that better recognise the national significance and benefits of the electricity network (including electricity distribution networks) and introduction of new permitted activity standards for EV charging infrastructure as it will help to support the rapid e-mobility transition and achieve New Zealand's emissions reduction targets.

e-Mobility Context: New Zealand's transport electrification depends critically on infrastructure deployment efficiency. The Government's target of 10,000 public EV chargers by 2030 requires streamlined consenting processes that these amendments can provide. Faster infrastructure deployment directly supports EV adoption rates by reducing range anxiety and enabling widespread e-mobility uptake across both urban and regional areas.

Critical Gap Identified: Current regulatory settings create inconsistent treatment of public charging infrastructure across regions, with complex resource consent requirements and excessive electricity connection costs that are constraining private investment and slowing e-mobility adoption.

Our Recommendations:

- Recognise public charging infrastructure as **permitted activities under the amended NES**, but expand the benefits provided for journey charging locations into other types of public and private EV charging locations (such as suburban retail locations, community centres, sports facilities, tourist attractions, rural township locations and many others that provide essential charging access for daily mobility needs) so more can benefit from the efficiency gains.
- Establish clear guidelines for councils to **treat EV charging infrastructure as permitted activities where environmental effects are minor**, reducing deployment timeframes that currently constrain e-mobility growth

2. Clarifying Public Charging Infrastructure Definition

The NES standards should ensure they are reflective of typical charging site infrastructure and capture typical EV charging site activity.

We recommend Ministers review feedback from entities delivering EV charging infrastructure particularly to ensure the definition of "EV charging infrastructure" reflects typical EV charging facilities such as :

- Ancillary infrastructure included (E.g. charging units, electrical connections, control systems, payment terminals, safety equipment, site foundations, lighting, weather protection, signage, security equipment, and site access infrastructure)
- Cover both AC and DC charging across all power ratings
- Apply to all vehicle types (light vehicles, commercial vehicles, heavy freight, e-bikes/scooters)
- Enable co-location with other permitted activities (retail facilities, rest areas, service stations)

3. Expanding scope to cover typical public charging site activity

We recommend Ministers ensure **routine maintenance and technology upgrades** for existing charging infrastructure are permitted activities (e.g., upgrading from 50kW to 150kW charging capacity without requiring new consent processes).

The proposed technical standards must align with typical EV charging equipment specifications, particularly regarding noise levels for DC charging infrastructure.

The standards should be calibrated to accommodate commercially available charging technology whilst maintaining appropriate environmental protection, ensuring that typical DC charging installations can operate as permitted activities without triggering consent requirements**.**

4. Supporting efficient deployment of EDB assets required for new and upgraded connections

Current Network Connection Barriers

Lengthy electricity connection processes represent a critical deployment barrier for charging infrastructure developers and public charge point operators. The current regulatory environment creates substantial deployment barriers for CPOs through inconsistent territorial authority processes, variable network pricing, uncertain land use classifications, and restrictive technical requirements.

Supporting EDB Infrastructure Efficiency

We support proposals that enable network companies to deploy connection infrastructure more efficiently, including streamlined consenting for EDB connection assets required to serve new charging infrastructure, permitted activity status for standard connection infrastructure (transformers, switchgear, distribution lines), standardised technical requirements that reduce design and approval timeframes, and enabling EDBs to undertake preparatory network reinforcement works as permitted activities where they facilitate future charging infrastructure connections.

Conclusion

We support the proposed amendments that r**ecognises EV charging infrastructure as nationally significant** as essential modernisation of New Zealand's electricity infrastructure regulatory framework. We urge the Ministry for the Environment to proceed with these amendments provided they are altered to apply to more typical EV charging locations and definitions reflect typical EV charging site assets and activity.

The success of New Zealand's electrification goals depends on rapidly scaling public charging infrastructure through private investment while simultaneously improving the efficiency of distribution asset deployment. The amended NES framework must enable this scaling by addressing the systemic barriers that are currently constraining investment and hampering infrastructure deployment. Most critically, these amendments must recognise that efficient infrastructure deployment is fundamental to e-mobility adoption - without streamlined, cost-effective charging infrastructure rollout, New Zealand's transport electrification goals will remain unachievable.

Thank you for considering our submission.

Yours sincerely,

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