

**BEFORE THE HEARINGS PANEL**

**UNDER THE**

Resource Management Act 1991

**IN THE MATTER OF**

the Proposed Far North District Plan

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**STATEMENT OF EVIDENCE OF NISHAN SOOKNANDAN ON  
BEHALF OF TOP ENERGY**

**HEARING STREAM 12 (Historic and Cultural Values)**

Electrical Engineering

12 May 2025

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**GREENWOOD ROCHE**  
LAWYERS  
AUCKLAND  
Solicitor: F M Lupis  
(francelle@greenwoodroche.com)

Level 6, Hayman Kronfeld Building  
15 Galway Street  
Auckland 1010  
PO Box 106006  
Auckland 1143

## **1 INTRODUCTION**

- 1.1 My full name is Nishan Sooknandan. I am the Engineering and Planning Manager with Top Energy Networks, an Electricity Provider in the Far North Region. I am based in the Kerikeri office.
- 1.2 I am a qualified and experienced Electrical Engineer with a Bachelor's Degree in Electrical Engineering. I am also a Chartered Member of Engineering New Zealand. I have 17 years of experience in the Electrical Distribution Industry and have worked at Top Energy Limited (*Top Energy*) for almost three and a half years.

### **Code of conduct**

- 1.3 Although this is not an Environment Court proceeding, I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses, contained in the Environment Court Practice Note 2023, and agree to comply with it. My qualifications and expertise are set out above. Other than where I state that I am relying on the advice of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

## **2 SCOPE OF EVIDENCE**

- 2.1 My evidence addresses the submission (#483) and further submission (#FS369) by Top Energy on the PDP, as relevant to Hearing Stream 12, and in particular addresses the following discrete issues:
- (a) Rule HA-R6 (Infrastructure not located within a site containing a scheduled Heritage Resource) & Rule HA-R10 (Infrastructure within a site containing a scheduled Heritage Resource (Section 3); and
  - (b) Rule HH-R6 – Infrastructure within a site containing scheduled Heritage Resource (Section 4).

**3 Rule HA-R6 (Infrastructure not located within a site containing a scheduled Heritage Resource) & Rule HA-R10 (Infrastructure within a site containing a scheduled Heritage Resource)**

- 3.1 Top Energy made a submission to Rule HA-R6 seeking to include two new permitted activity rules which provide for:
- (a) the maintenance, upgrade, and repair of existing network utilities, buildings and structures in all Heritage Area Overlays; and
  - (b) new network utilities in all Heritage Area Overlays.
- 3.2 The Reporting Officer has recommended the restructuring of Rule HA-R6 so that there are two different permitted pathways for infrastructure, i.e. depending on whether the Heritage Area Overlay already has a permitted pathway under Rule HA-R6 as notified, or whether the Heritage Area Overlay was subject to a full discretionary activity pathway under Rule HA-R10.
- 3.3 I am supportive of the additional permitted pathway for infrastructure within Heritage Area Overlays under HA-R6, including that the maintenance, repair or upgrading of any existing above-ground infrastructure is provided for as a permitted activity.
- 3.4 Similarly, I am also supportive of the addition to exclude maintenance, repair or upgrading of any existing above-ground infrastructure from the requirement for resource consent under Rule HA-R10.
- 3.5 From a technical perspective, I am however concerned with the proposed 1m relocation limit that is attributed to the maintenance, repair or upgrading of any existing above-ground infrastructure listed in both PER-1 of Rule HA-R6 and the exclusion for Rule HA-R10. I consider this limit to be inappropriate from an engineering perspective for the following reasons:
- (a) The 1m limit will not allow for sufficient operational flexibility for the replacement of existing assets. To minimise outages and disruption to power supply, a new site is established first for the replacement unit before changeover to the new unit is

completed. Often, the new site will need to be more than 1m away from the existing asset to enable works and/or because there is no suitable site within 1m of the location of the existing asset.

- (b) The replacement asset can also have a larger footprint than the existing asset because the existing unit has been discontinued, and the equivalent design differs from the original in size.
- (c) The installation of assets requires a minimum separation from other assets for operational and safety requirements and this will result in the new unit being further away from its original location.

3.6 In my opinion and based on my experience, a 3m relocation limit would provide a sufficient area to ensure that technical considerations outlined above can be addressed.

3.7 I therefore support a 3m relocation limit for the maintenance, repair or upgrading of existing above-ground infrastructure being applied for HA-R6-PER-1 and excluded from Rule HA-R10, as is further outlined in the planning evidence of Mr Badham and Ms McGrath.

#### **4 Rule HH-R6 - Infrastructure within a site containing scheduled Heritage Resource**

4.1 Consistent with my position on Rule HA-R10 above, I am supportive of the addition to exclude maintenance, repair or upgrading of any existing above-ground infrastructure from requiring resource consent under Rule HH-R6.

4.2 However, based on the reasons outlined above, I also support a 3m relocation limit for the maintenance, repair or upgrading of existing above-ground infrastructure under Rule HH-R6, as is further outlined in the planning evidence of Mr Badham and Ms McGrath.

**Nishan Sooknandan**

**12 May 2025**