

**BEFORE FAR NORTH DISTRICT COUNCIL**

**IN THE MATTER OF**

the Resource Management Act 1991

**AND**

**IN THE MATTER OF**

Far North District Council's Proposed  
District Plan: Hearing Topic 13 – Natural  
Hazards

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**STATEMENT OF EVIDENCE TOM ANDERSON**

**ON BEHALF OF**

**CHORUS NEW ZEALAND LIMITED, CONNEXA LIMITED, FORTYSOUTH GROUP  
LP, ONE NEW ZEALAND GROUP LIMITED AND SPARK NEW ZEALAND TRADING  
LIMITED**

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**6 June 2025**

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## **Professional Qualifications and Experience**

1. My name is Tom Anderson. I am a Principal Planner and a Director of Incite, a resource management consulting firm.
2. I have been engaged by Chorus New Zealand Limited (Chorus), Spark New Zealand Trading Limited (Spark), Connexa Limited (Connexa), One New Zealand Group Limited (One NZ) and FortySouth Group LP (FortySouth), referred to in this evidence as “the Companies”, to provide evidence as an independent planner. This evidence relates to their submissions on the Proposed Far North District Plan (Proposed Plan) Hearing Topic 13 in regard to Natural Hazards.
3. I note that my colleague, Mr Chris Horne, has lodged evidence on behalf of the Companies in regard to Hearing Topic 13. However, in the time that has elapsed since, Mr Horne has realised he has a scheduling conflict, and as such has asked me to review his evidence and assist in responding to any questions the hearing panel may have.
4. For context, Mr Horne and I share the workload in regard to planning policy matters. I have provided similar evidence to Mr Horne recently for the Napier, Gore, Mackenzie, Timaru and Combined Wairarapa District Plan reviews.
5. In terms of my qualifications and wider experience, I have been working as a planner for 18 years. Throughout my career I have provided advice to a number of telecommunication and radiocommunication companies, including submitters, as well as Two Degrees Networks Limited, Rural Connectivity Group and Vital (formerly TeamTalk). I have provided these companies with advice on district and unitary plan reviews and plan changes, site selection exercises, designation and outline plan of works processes, and consenting activities for network rollouts and exchange upgrades.
6. On this basis, I consider myself to have a comprehensive understanding of telecommunication and radiocommunication networks, and the practical implications of the Resource Management Act 1991 (RMA) framework in relation to network installation, upgrade and operation.
7. I am also experienced in District Plan reviews for Council’s (including chapter drafting, s32, s32AA and s42A reports) as well as seeking resource consent’s for complex land development and infrastructure projects.

8. I have read and am familiar with the Code of Conduct for Expert Witnesses (section 9 of the Environment Court Consolidated Practice Note 2023). My evidence has been prepared in compliance with that code. In particular, unless I state otherwise, this evidence is within my area of expertise, and I have not omitted to consider any material facts known to me that might alter or detract from the opinions I express.

### **Scope and Purpose of Evidence**

9. This evidence has been prepared after Mr Horne advised me of his scheduling clash. The purpose of this evidence is to introduce myself, my experience and my compliance with the code of conduct, as well as to provide my views on Mr Horne's already lodged evidence.
10. On that last matter, I confirm that I have read Mr Horne's evidence for Hearing Topic 13 dated 4 June 2025. I agree with and endorse the conclusions reached by Mr Horne.
11. For completeness, I have included Regulation 57 of the Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016 (NESTF):

#### ***57 District rules about natural hazard areas disapplied***

- (1) A territorial authority cannot make a natural hazard rule that applies to a regulated activity.*
- (2) A natural hazard rule that was made before these regulations came into force, does not apply in relation to a regulated activity.*
- (3) In this regulation, natural hazard rule means a district rule that prescribes measures to mitigate the effect of natural hazards in an area identified in the district plan as being subject to 1 or more natural hazards.*

12. The relief sought at Paragraph 22 of Mr Horne's evidence ensures that those activities which are not regulated by the NESTF (being new poles outside of road in urban zones), would be treated consistently with the NESTF regulated activities.
13. I am happy to answer any questions.



Tom Anderson

6 June 2025