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14 October 2025

Proposed Far North District Plan
Far North District Council

Delivered via email to: alicia-kate.taihia@fndc.govt.nz

Dear Sir/Madam

**For the Attention of the Hearing Panel – Proposed Far North District Plan:
Hearing 17 – General / Miscellaneous / Sweep Up & Tangata Whenua Matters**

- Statement by Transpower New Zealand Ltd (submitter reference 454)

Transpower New Zealand Limited (“Transpower”) writes in relation to the Proposed Far North District Plan (“the PDP”) and Hearing 17: General / Miscellaneous / Sweep Up & Tangata Whenua Matters, commencing on 4 November 2025.

Transpower has reviewed the Section 42A reports prepared by the reporting officer for the topic of General / Miscellaneous / Sweep Up & Tangata Whenua Matters and with one exception, generally accepts the reporting officer’s recommendations in respect of Transpower’s six original and nine further submission points. Following the review, Transpower has determined that it will not present evidence to Hearing 17 and instead respectfully requests that this letter is tabled for the Panel’s attention in relation to Hearing 17.

For completeness, the following briefly outlines the relevant submission points and Transpower’s response.

Recommendations supported

- **Submission points S454.001, S454.016, S454.004, S454.006, and S454.007, and further submission points FS78.028 and FS78.029.** Transpower supports the officer recommendation in respect of the above submission points, noting the submission points seek the retention of the definitions (being Development Infrastructure, Functional need, Operational need and Regionally significant infrastructure) and reference/consistency with the National Planning Standards, and consistent use of terminology.
- **Submission point S454.017.** Transpower accepts the recommendation to not amend the definition of ‘Emergency service’ to reference the National Grid. Transpower agrees the National Grid is otherwise provided for in the plan and the requested relief is not necessary.
- **Further submission point FS78.031.** Noting the submission point was addressed at Hearing 11, the recommendation to include the definition of ‘Upgrading’ is supported.
- **Further submission point FS78.006.** The recommendation to not include a definition of ‘Additional Infrastructure’ is supported. As outlined in its submission, Transpower has concerns with the uncertainty the additional definition may create.

- **Further submission point FS78.030.** The recommendation to not include ‘nesting tables’ within the definition is also accepted, acknowledging the difficulty in inserting such tables and the potential for error.
- **Submission point S454.012 and further submission point FS78.023.** Transpower sought (and supported through a further submission) the insertion of a definition of ‘reverse sensitivity’. Transpower understands the concerns of the reporting officer in providing inconsistencies with the definition in the RPS. At the very least Transpower would support a definition that reflects that in the RPS, or a ‘sign-post’ to direct users to the RPS definition.
- **Submission point S454.103.** Transpower sought to replace Rule EW-R15 with a Permitted Activity rule for earthworks near transmission lines. This submission point was addressed at the Earthworks Hearing 6/7 with amendments recommended to the renumbered rule EW-R2. Transpower’s evidence on this submission point provided at Hearing 6/7 stands.

Recommendation not supported

- **Submission point S454.013.** For the purpose of plan clarity, Transpower sought amendment to the definition of sensitive activities to remove the reference to the activities (schools, residential buildings, and hospitals) listed in the NPSET. This has been rejected by the reporting officer on the basis *“These examples serve as reference points that assist users in interpreting the rule, particularly when evaluating the potential effects of electricity transmission infrastructure. Their inclusion aligns with the National Policy Statement on Electricity Transmission (2008), reinforcing the intent and scope of the rule. Removing them risks creating ambiguity and inconsistent application across planning documents.”*

Transpower is cognisant of impending changes to national direction. In order to ‘future proof’ the district plan, Transpower would support the deletion of the reference to ‘schools, residential buildings, and hospitals’ as sought in its submission, and insertion of reference to any replacement NPS. Supported wording is as follows:

SENSITIVE ACTIVITY

1. means:

- a. Residential activities;*
- b. Education facilities and preschools;*
- c. Guest and visitor accommodation;*
- d. Health care facilities which include accommodation for overnight care;*
- e. Hospital;*
- f. Marae; or*
- g. Place of assembly.*

except that;

- i. subclause f. above is not applicable in relation to electronic transmission.*
- ii. subclause g. above is not applicable in relation to noise or electronic transmission*

2. *In relation to electricity transmission, has the same meaning as sensitive activities in the National Policy Statement on Electricity Transmission (2008): ~~includes schools, residential buildings and hospitals~~ or its replacement.*

Transpower respectfully requests that this letter be tabled for the Hearing Panel's consideration, to confirm its position in relation to its submission points and the Section 42A Report recommendations.

Should the Hearing Panel require clarification on any matter, please contact Daniel Hamilton at Transpower (03 590 6926), or on the following email: environment.policy@transpower.co.nz.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Daniel Hamilton', with a stylized, cursive script.

Daniel Hamilton
Strategic Lead – Environmental Policy
TRANSPOWER NEW ZEALAND LIMITED

