

**IN THE MATTER** of the Resource Management Act  
1991

**AND**

**IN THE MATTER** of Hearing Stream 7 for the  
Energy, Infrastructure, Transport and Designations  
topics of the Proposed Central Hawkes Bay District  
Plan.

**BY FEDERATED FARMERS OF NEW ZEALAND**

**TO Central Hawke's Bay District Council**

---

**Statement of Evidence**

**Rhea Dasent  
On behalf of Federated Farmers**

**30 November 2022**

---



## INTRODUCTION

1. This Statement of Evidence is for Hearing Stream 7 for: *Energy, Infrastructure, Transport and Designations*. Federated Farmers is most interested in the Network Utilities topic.
2. My name is Rhea Jane Dasent and I am a senior regional policy advisor for Federated Farmers of New Zealand. I am authorised to speak on behalf of Federated Farmers.
3. I have thirteen years of experience in resource management issues to do with farming, having worked for Federated Farmers as a regional policy advisor since 2009. My role is to provide policy advice and advocacy on behalf of Federated Farmers members in processes arising under the Resource Management Act, Local Government Act and Local Government (Rating) Act. I analyse, submit, present at hearings and conduct Environment Court appeals on behalf of members. My work is informed and mandated by our elected representatives and local members. I also have practical farming experience, being currently employed on the family farm in the Hastings District.
4. I hold a Bachelor of Science Degree and a Bachelor of Arts Degree from Victoria University of Wellington, and I have previous experience as a resource consent officer working for local government.
5. My views are closely aligned with those of Federated Farmers, due to my personal farming background.
6. Federated Farmers is a voluntary membership-based organisation that represents farmers and other rural businesses. Federated Farmers has a long and proud history of representing the needs and interests of New Zealand's farmers and as such has a keen interest in the Central Hawke's Bay District Plan.
7. Federated Farmers made submissions and further submissions on the Energy, Infrastructure, Transport and Designations topics of the District Plan. These submissions are representative of our members' views and experiences with the management of the resources in the Central Hawke's Bay District and reflect the fact that these chapters of the proposed Plan will have a significant impact on our members' daily lives living next to, and sometimes providing their own land as the platform for, network utilities.
8. I wish to acknowledge and support submissions made by individual members of Federated Farmers.

## GAS TRANSMISSION LINES

9. Federated Farmers discusses our opposition to provisions for gas transmission lines in Hearing Stream 3 for the Rural Environment. Gas transmission is already protected with 100% legal easement agreement coverage and there is no need for District Plan provisions.

## NATIONAL GRID YARD

10. Federated Farmers discusses our submission to ensure the National Grid Yard and Subdivision Corridor are consistent with the National Policy Statement for Electricity Transmission, and with the Code of Practice for Electrical Safety Distances NZECP34:2001, in Hearing Stream 3 for the Rural Environment.

## POLICY NU-P5

11. Federated Farmers is particularly interested in Policy NU-P5, for the reason that it will have the most impact on farming by constraining farming activities for the benefit of network utilities.
12. While we agree that network utilities are important to the functioning of the district, they are a land use like many others, with adverse effects that need to be managed. Many utilities are for-profit companies and are not Government-owned state services. This is why the definition of *Network Utility* and *Network Utility Operator* are not confined to the state.
13. Nor do network utilities enjoy protected status under Section 6 of the RMA. There are already a number of regulatory instruments that benefit network utilities that are located on private land, including the New Zealand Electrical Code of Practice for Electrical Safe Distances NZECP34:2001, the Electricity (Hazards from Trees) Regulations 2003, the Gas Act 1992 and the Public Works Act for access. The National Grid has the National Policy Statement for Electricity Transmission as an additional instrument, but this NPS does not extend to local electricity distribution owned by Centralines. Gas transmission also does not have an NPS.
14. The District Plan must be careful to ensure different treatment for utilities that are located on their own property, like roads and rail, with utilities that occur on land that is owned by someone else, often a farmer, like electricity transmission and distribution lines, and gas transmission. Provisions that enable the network utility operator freedom and flexibility to conduct their activities and to prevent other incompatible activities from establishing will be appropriate where the utility is on land that is owned by the network operator. But it will be inappropriate to unduly restrict and limit existing farming by the farmer who owns the land, for the benefit of the utility that is built upon their property.
15. We are concerned that provisions intended to manage the effects of urban development on network utilities will end up unnecessarily restricting farming.
16. The Section 42a Report recommends NU-P5 be amended:

### Section 42 Report Recommendation

**NU-P5** To the extent reasonably possible, manage ~~protect~~ network utilities from the adverse effects of subdivision, use and development to avoid reverse sensitivity effects on network utilities ~~that~~ where it may constrain or compromise

*the safe, effective, secure and efficient operation, maintenance, upgrading and development of network utilities, ~~and the safety and amenity values of people and the community~~, including by:*

- 1. managing new activities through setbacks and design controls, where necessary, to achieve appropriate protection of a network utility;*
- 2. managing new activities that are sensitive to noise adjoining the railway corridor, the national and regional road network, and within any defined noise contour to avoid reverse sensitivity effects;*
- 3. managing access to the railway corridor and to the national and regional road network;*
- 4. managing light spill and glare from activities on road users;*
- 5. managing land disturbance and activities in the vicinity of gas transmission pipelines;*
- 6. managing land use development (including sensitive activities), buildings, earthworks, vertical holes and structures ~~and subdivision near the National Grid, within the National Grid Yard, and subdivision within the National Grid Subdivision Corridor, or around a designated National Grid substation~~ to ensure the electricity transmission network is not compromised;*
- 7. managing land disturbance, earthworks and vertical holes, land use development and buildings to maintain safe electrical clearance distances under electricity distributions lines and support structures; and*
- 8. ensuring subdivision of sites containing a network utility activity ~~retain the ability for the network utility operator to access, operate, maintain, repair and upgrade the network utility.~~*

17. While it is commendable that wording similar to the NPS-ET is used here, it must be remembered that the NPS only applies to the National Grid and not to other utilities. *Avoiding reverse sensitivity* is the direction given in the NPS-ET specifically for the National Grid, not for other utilities. Federated Farmers recommends that this phrasing is shifted into the clause 6 that is specific to the National Grid.

18. It is reasonable to manage adverse effects on existing network utilities, however upgrading and development are different. Existing activities like farming shouldn't be constrained for the future upgrading or development of network utilities. It is difficult to define what future upgrading or development may be, even firm proposals will be subject to change.

#### **Federated Farmers Recommendation**

**NU-P5** *To the extent reasonably possible, manage ~~protect network utilities from the adverse effects of~~ subdivision, use and development to avoid reverse sensitivity effects on network utilities ~~that where it may constrain or compromise the safe, effective, secure and efficient operation and maintenance, upgrading and development~~ of network utilities, ~~and the safety and amenity values of people and the community~~, including by:*

1. *managing new activities through setbacks and design controls, where necessary, to achieve appropriate protection of a network utility;*
2. *managing new activities that are sensitive to noise adjoining the railway corridor, the national and regional road network, and within any defined noise contour to avoid reverse sensitivity effects;*
3. *managing access to the railway corridor and to the national and regional road network;*
4. *managing light spill and glare from activities on road users;*
5. *managing land disturbance and activities **within the legal easements-in the vicinity** of gas transmission pipelines;*
6. *managing land use development (including sensitive activities), buildings, earthworks, vertical holes and structures ~~and subdivision near the National Grid~~, within the National Grid Yard, and subdivision within the National Grid Subdivision Corridor, or around a designated National Grid substation to **avoid reverse sensitivity and ensure the electricity transmission network is not compromised**;*
7. *managing land disturbance, earthworks and vertical holes, land use development and buildings to maintain safe electrical clearance distances under electricity distributions lines and support structures; and*
8. *ensuring subdivision of sites containing a network utility activity retain the ability for the network utility operator to access, operate, maintain, repair and upgrade the network utility **via legal easement agreements**.*

## UPGRADING AND DEVELOPMENT

19. Federated Farmers is concerned that the definition of Minor Upgrading sought by Transpower will allow for activities with a significant scale of adverse effects to inappropriately occur as permitted.
20. Federated Farmers looks to [Electricity Act 1992 section 23\(3\)\(b\)](#) when considering what minor upgrading to electricity transmission lines (both National Grid and local distribution lines) may be. This Section of the Act discusses replacement or upgrade of existing works as long as the land will not be injuriously affected as a result.
21. We are also concerned that the definition of minor upgrading will determine what is not considered *injurious affection* and therefore undermining the ability of landowners to seek compensation. Activities such as a replacement support structure that is not in the same footprint but somewhere else along the line, and extra overhead lines being installed, are likely to cause injurious affection and a basic entitlement to compensation will be allowed under Section 60 of the Public Works Act 1981.
22. A support structure such as a tower or pole being relocated is significant to a landowner. Although the number of structures on their property is not being increased, they may have to rearrange the use of their land around the

replacement structure. It will restrict where they can build their own farm structures, fences, do earthworks, sow crops, and even where they can drive vehicles because the overhanging wire height may change.

23. The Section 42a Report discusses this starting paragraph 14.3.25, and recommends a new definition;

MINOR UPGRADING means an increase in the carrying capacity, efficiency, safety or security of existing electricity and telecommunication lines, utilising existing support structures or replacement structures, and where the effects of the utility remain the same or similar in character, scale and intensity as those that existed prior to the commencement of the minor upgrading. It includes:

- (a) adding new circuits;
- (b) re-conductoring with higher capacity conductors;
- (c) re-sagging of conductors; fitting longer or more efficient insulators;
- (d) placement of support structures within a similar location as the support structure that is replaced;
- (e) adding earthwires which may contain telecommunication lines, earthpeaks and lighting rods;
- (f) adding electrical or telecommunication fittings;
- (g) replacement of existing cross arms, including cross arms of different design but similar scale; and
- (f) installation of fibre-optic cables onto existing transmission lines.

It excludes any increase in the voltage of a line, unless the line was originally constructed to operate at the higher voltage.

24. Federated Farmers prefers the Section 42a Report wording, we particularly support the limitation that effects of the utility must remain the same or similar in character, scale and intensity as those that existed prior. We also support the exclusion of voltage increase. The definition must also only apply to electricity transmission, and not to other utilities such as roads and rail.



NETWORK UTILITIES				
Plan Provision	FFNZ Further Submission	Original Submitter	Section 42a Recommendation	Federated Farmers position
<b>Key Issue 3 - Introduction</b>				
NU - Introduction	FS25.6 Oppose in part	S79.018 Transpower New Zealand Ltd	Paragraph 6.4.3, Reject Transpower's submission, for the reason that provisions managing the effects of other activities on network utilities should be retained within the relevant chapters, outside the Network Utilities chapter.	Agree with Section 42a recommendation.
<b>Key Issue 4: Issues</b>				
NU-I1	FS25.7 Oppose	S56.006 Powerco Limited	Paragraph 7.5.1, Amend NU-I1 and NU-I2 to read: <b>NU-I1</b> <i>Essential Role of Network Utilities Network utilities have important functions and enable people and communities to provide for their health and safety and social, economic, and cultural wellbeing; but can have adverse effects on the environment, often due to their technical, operational, and location specific requirements</i>  <b>NU-I2</b> <i>Adverse Effects of Network Utilities and Amateur Radio Configuration Some network utilities and amateur radio facilities can have adverse effects on the environment, often due to their technical, operational, and location specific requirements</i>	Agree with Section 42a recommendation, For the reason that adverse effects are inserted into NU-I2 instead.
<b>Key Issue 5 – Objectives</b>				
NU-O1	FS25.8 Support in part	S79.022 Transpower New Zealand Ltd	Paragraph 8.5.1, amend NU-O1 to read: <i>Recognise and provide for safe, effective, efficient and resilient network utilities throughout the District that provide essential and secure services <u>and</u></i>	Federated Farmers does not oppose the Section 42 amendments.

			<i><u>connections, including in emergencies, integrate with urban development, contribute to the economy and <del>that</del> enable people and communities to provide for their health, safety and wellbeing.</u></i>	
NU-O1	FS25.9 Oppose  FS25.10 Oppose  FS25.11 Oppose	S117.031 Chorus New Zealand Ltd  S118.031 Spark New Zealand Ltd  S119.031 Vodafone New Zealand Ltd	Paragraph 8.5.1, amend NU-O1 to read: <i>Recognise and provide for safe, effective, efficient and resilient network utilities throughout the District that provide essential and secure services <u>and connections, including in emergencies, integrate with urban development, contribute to the economy and <del>that</del> enable people and communities to provide for their health, safety and wellbeing.</u></i>	Federated Farmers does not oppose the Section 42 amendments.
NU - 03	FS25.12 Oppose in part	S79.023 Transpower New Zealand Ltd	Paragraph 8.3.25 <i>... Objective NU-03 be retained as notified.</i>	The Section 42a Report has accidentally omitted Federated Farmers opposition to Transpower S79.023 regarding NU-03, and has instead incorrectly recorded our further submission onto NU-02.  Federated Farmers supports the recommendation to retain NU-03 as notified.
NU-O3	FS25.13 Oppose  FS25.14 Oppose	S117.033 Chorus New Zealand Ltd  S118.033 Spark New Zealand Ltd	Paragraph 8.3.21 <i>I consider that the request by Chorus, Spark and Vodafone to replace Objective NU-03 with Objective IE-03 is unnecessary and inappropriate, as the matters IE-03 refers to are already addressed under Policy NU-P5</i> Paragraph 8.3.25	Federated Farmers supports the recommendation to retain NU-03 as notified.

	FS25.15 Oppose	S119.033 Vodafone New Zealand Ltd	... <i>Objective NU-O3 be retained as notified.</i>	
<b>Key Issue 6 - Policies</b>				
NU-PXX (new policy)	FS25.16 Oppose in part	S79.026 Transpower New Zealand Ltd	Paragraph 9.3.12 <i>I consider all matters addressed under the requested new policy are appropriately covered under Policies NU-P1, NU-P2 and NU-P3 of the Proposed Plan, and the new policy is unnecessary.</i>	Agree with the Section 42a recommendation.
NU-PXX (new policy)	FS25.17 Oppose  FS25.18 Oppose  FS25.19 Oppose	S117.040 Chorus New Zealand Ltd  S118.040 Spark New Zealand Ltd  S119.040 Vodafone New Zealand Ltd	Paragraph 9.3.5 <i>... I therefore consider that it is unnecessary to include a separate, new policy on technological advances.</i>	Agree with the Section 42a Report that a new policy is unnecessary.
NU-P1	FS25.20 Oppose  FS25.21 Oppose  FS25.22 Oppose	S117.034 Chorus New Zealand Ltd  S118.034 Spark New Zealand Ltd  S119.034 Vodafone New Zealand Ltd	Paragraph 9.3.15 Retain as notified. <i>... Policy NU-P1 as notified adequately addresses the matters of concern.</i>	Agree with the Section 42a Report to retain NU-P1, with the spelling mistake corrected.

<p>NU-P5</p>	<p>FS25.23 Oppose</p>	<p>S79.030 Transpower New Zealand Ltd</p>	<p>Paragraph 9.3.64 amend NU-P5: <b>NU-P5</b> <i>To the extent reasonably possible, manage <del>protect network utilities from the adverse effects of subdivision, use and development to avoid reverse sensitivity effects on network utilities that where it may constrain or compromise the safe, effective, secure and efficient operation, maintenance, upgrading and development of network utilities, and the safety and amenity values of people and the community,</del> including by:</i></p> <ol style="list-style-type: none"> <li>1. <i>managing new activities through setbacks and design controls, where necessary, to achieve appropriate protection of a network utility;</i></li> <li>2. <i>managing new activities that are sensitive to noise adjoining the railway corridor, the national and regional road network, and within any defined noise contour to avoid reverse sensitivity effects;</i></li> <li>3. <i>managing access to the railway corridor and to the national and regional road network;</i></li> <li>4. <i>managing light spill and glare from activities on road users;</i></li> <li>5. <i>managing land disturbance and activities in the vicinity of gas transmission pipelines;</i></li> <li>6. <i>managing land use development (including sensitive activities), buildings, <u>earthworks, vertical holes and structures</u> <del>and subdivision near the National Grid, within the National Grid Yard, and subdivision within the National Grid Subdivision</del></i></li> </ol>	<p>Agree with the amendment from <i>protect</i> to <i>manage</i>. Where network utilities are located over private land, often it is the utility that can have the reverse sensitivity effect on the existing land use, such as farming. Utilities are not an RMA s.6 matter that need protection, they are a land use. And like other land uses, adverse effects are managed.</p> <p>While we agree with the S.42a Report that wording should be similar to Policy 10 of NPSET (para 9.3.58) it must be remembered that NPSET is specific to the National Grid owned and operated by Transpower, and not to all network utilities such as roads, rail or electricity distribution as in this NU-P5.</p> <p>Like Horticulture NZ below, Federated Farmers seeks that clause 5 for gas transmission lines be deleted. The gas transmission network is already managed via legal easement agreements and district plan provisions are inconsistent with these and unnecessary duplication of function</p>
--------------	---------------------------	---	--	---

			<p><u>Corridor, or around a designated National Grid substation to ensure the electricity transmission network is not compromised;</u></p> <p>7. <u>managing land disturbance, earthworks and vertical holes, land use development and buildings to maintain safe electrical clearance distances under electricity distributions lines and support structures; and</u></p> <p>8. <u>ensuring subdivision of sites containing a network utility activity retain the ability for the network utility operator to access, operate, maintain, repair and upgrade the network utility.</u></p>	
NU-P5	FS25.24 Support	S81.053 Horticulture New Zealand	<p>Paragraph 9.3.64 amend NU-P5: <b>NU-P5</b> <u>To the extent reasonably possible, manage protect network utilities from the adverse effects of subdivision, use and development to avoid reverse sensitivity effects on network utilities that where it may constrain or compromise the safe, effective, secure and efficient operation, maintenance, upgrading and development of network utilities, and the safety and amenity values of people and the community, including by:</u> ....</p>	Support the Section 42a recommendation to amend <i>protect to manage</i> .
NU-P5 (5)	FS25.25 Support	S81.054 Horticulture New Zealand	<p>Paragraph 9.3.64 amend NU-P5: <b>NU-P5</b> <u>To the extent reasonably possible, manage protect network utilities from the adverse effects of subdivision, use and development to avoid reverse sensitivity effects on network utilities that where it may constrain or compromise the safe, effective, secure and efficient operation, maintenance,</u></p>	Federated Farmers discusses our reasons why we want all provision for the gas transmission network deleted from the plan in our material lodged for Hearing Stream 3 - Rural Environment topic.

			<p><i>upgrading and development of network utilities, <del>and the safety and amenity values of people and the community</del>, including by:</i></p> <ol style="list-style-type: none"> <li>1.</li> <li>...</li> <li>5. <i>managing land disturbance and activities in the vicinity of gas transmission pipelines;</i></li> </ol>	<p>The gas transmission network is already managed via legal easement agreements and district plan provisions are inconsistent with these and unnecessary duplication of function.</p> <p>Federated Farmers seeks Clause 5 be deleted.</p>
NU-P5	<p>FS25.27 Oppose</p> <p>FS25.28 Oppose</p> <p>FS25.29 Oppose</p>	<p>S117.038 Chorus New Zealand Ltd</p> <p>S118.038 Spark New Zealand Ltd</p> <p>S.119.038 Vodafone New Zealand Ltd</p>	<p>Paragraph 9.3.64 amend NU-P5: <b>NU-P5</b> <i>To the extent reasonably possible, manage <del>protect network utilities from the adverse effects of subdivision, use and development to avoid reverse sensitivity effects on network utilities that</del> where it may constrain or compromise the safe, effective, secure and efficient operation, maintenance, upgrading and development of network utilities, <del>and the safety and amenity values of people and the community</del>, including by:</i></p> <ol style="list-style-type: none"> <li>1. <i>managing new activities through setbacks and design controls, where necessary, to achieve appropriate protection of a network utility;</i></li> <li>2. <i>managing new activities that are sensitive to noise adjoining the railway corridor, the national and regional road network, and within any defined noise contour to avoid reverse sensitivity effects;</i></li> <li>3. <i>managing access to the railway corridor and to the national and regional road network;</i></li> <li>4. <i>managing light spill and glare from activities on road users;</i></li> </ol>	<p>As above.</p> <p>Federated Farmers supports the evidence of Lynette Wharf for Horticulture New Zealand where she discusses best practice for District Plan provisions for network utilities. She notes that there were significant differences in approach, particularly relating to how third party activities may be regulated in regard to network utilities.</p>

			<p>5. <i>managing land disturbance and activities in the vicinity of gas transmission pipelines;</i></p> <p>6. <i>managing land use development (including sensitive activities), buildings, <u>earthworks, vertical holes and structures</u> <del>and subdivision near the National Grid</del>, within the National Grid Yard, <u>and subdivision within the National Grid Subdivision Corridor, or around a designated National Grid substation</u> to ensure the electricity transmission network is not compromised;</i></p> <p>7. <i>managing land disturbance, <u>earthworks and vertical holes</u>, land use development and buildings to maintain safe electrical clearance distances under electricity distributions lines and support structures; and</i></p> <p><i>ensuring subdivision of sites containing a network <u>utility activity</u> retain the ability for the network utility operator to access, operate, maintain, repair and upgrade the network utility.</i></p>	
<b>Key Issue 7 - Rules</b>				
NU - Rules	FS25.30 Oppose in part	S79.031 Transpower New Zealand Ltd	Paragraph 10.3.3 <i>I continue to hold the view that the relevant provisions for setbacks for activities from the National Grid should be retained within the chapters and not relocated to the NU – Network Utilities chapter.</i>	Support the Section 42a recommendation.
NU-R2	FS25.31 Support	S81.056 Horticulture New Zealand	Paragraph 10.3.17 <i>I do not support Hort NZ's request for there to be no increase in the voltage of a line as part of minor</i>	Federated Farmers continues to support Hort NZ's submission on increased voltage. Also supported is HortNZ's submission to include

			<i>upgrading, but I consider that it would be appropriate to ensure that, as part of minor upgrading, the voltage of a line does not increase unless the line was originally constructed to operate at the higher voltage.</i>	affects on landowners as a matter of restricted discretion.
<b>Key Issue 11 – Definitions and Abbreviations</b>				
Definition: <i>Gas Transmission Network</i>	n/a	S121.235 Federated Farmers	Paragraph 14.3.12 definition be retained as notified <i>I consider that it is appropriate to include a definition of Gas Transmission Network, as the network is identified on the PDP Maps and relates to provisions within the NU-Network Utilities chapter.</i>	Federated Farmers discusses our reasons why we want all provision for the gas transmission network deleted from the plan in our material lodged for Hearing Stream 3 - Rural Environment topic.  The gas transmission network is already managed via legal easement agreements. The 20m setback required by the rules is far in excess of the easement widths of 12 metres wide for a single pipeline, with an additional 4 metres for each additional pipeline. There is no justification why the district plan requires a setback that is 66% greater than the legal easement to manage either reverse sensitivity or safety.
Definition: <i>Maintenance</i>	n/a	S121.239 Federated Farmers	Paragraph 14.3.24 amend definition:  <i>MAINTENANCE to keep in existing order, to prevent loss or deterioration, or to restore to working order. Does not include extending, replacing, removing or demolishing a structure, or any substantive change to the form, orientation, or outline of the structure.</i>	Federated Farmers supports the Section 42a recommendation to exclude minor upgrading and upgrading, and that lines must be the same voltage.  However if it is recognised that the voltage must remain the same in order to be considered maintenance, then the height, size

			<p><u>Specifically in relation to network utilities, 'maintenance' means: any replacement, repair or renewal work or activity necessary to continue the operation and/or functioning of an existing network utility. Includes the replacement of an existing line of the same voltage, building, structure or other facilities with another of the same or similar height, size and scale, within the same or similar position and for the same or similar purpose. It does not include minor upgrading or upgrading.</u></p> <p>[...]</p>	<p>and scale must also be the same to be considered maintenance. Increases in height, size and scale are likely to cause an injurious affection on landowners and are more likely to fall into the definition of minor upgrading and upgrading.</p> <p>For this reason, Federated Farmers submits that <i>or similar</i> is deleted from the definition:</p> <p><u>Specifically in relation to network utilities, 'maintenance' means: any replacement, repair or renewal work or activity necessary to continue the operation and/or functioning of an existing network utility. Includes the replacement of an existing line of the same voltage, building, structure or other facilities with another of the same <del>or similar</del> height, size and scale, within the same <del>or similar</del> position and for the same <del>or similar</del> purpose. It does not include minor upgrading or upgrading.</u></p> <p>[...]</p>
Definition: <i>National Grid Subdivision Corridor.</i>	n/a	S121.241 Federated Farmers	Paragraph 14.3.35, retain the definition as notified.	Federated Farmers accepts the definition is retained, however the diagram must be corrected to refer to the National Grid Subdivision Corridor with the subdivision corridor widths. It is confusing to have the diagram for the NatGrid Yard in the definition of the <i>Subdivision Corridor</i> .
Definition: <i>National Grid Yard</i>	n/a	S121.242 Federated Farmers	Paragraph 14.3.40, retain as notified.	Federated Farmers discusses the National Grid Yard in our material lodged for Hearing Stream 3 - Rural Environment topic.

				Federated Farmers submits that the National Grid Yard must be consistent with the <a href="#">New Zealand Code of Practice for Electrical Safety Distances NZECP34</a> <sup>1</sup> and the <a href="#">National Policy Statement for Electricity Transmission</a> <sup>2</sup> , and not undermine landowners' rights awarded by their legal easement agreements and other legislation. We seek the 12m setback from poles be reduced to 10m to be consistent with other District Plans.
Definition: <i>Gas Distribution Network</i>	FS25.1 Oppose	S56.002 Powerco Limited	Paragraph 14.3.54, add new definition for Gas Distribution Network:  <i>While I consider that it is not essential, in relation to the provisions of the Network Utilities chapter, adding a new definition of 'Gas Distribution Network' would be helpful in clarifying the differences between a Gas Transmission Network and a Gas Distribution Network, as follows:</i>  <u><i>GAS DISTRIBUTION NETWORK any gas pipeline with a pressure less than 2,000 kilopascals, inclusive of any incidental above or below ground equipment which forms part of the distribution network.</i></u>	Federated Farmers opposes the new definition as being unnecessary and an example of regulatory creep. A definition will make it tempting to include new regulations for this topic at a later date. Gas pipelines over property are managed by legal easement agreements and district plan provisions are unnecessary.
Definition: <i>Minor upgrading.</i>	FS25.2 Oppose	S79.006 Transpower New Zealand Ltd	Paragraph 14.3.27, add new definition for Minor Upgrading:  <u><i>MINOR UPGRADING means an increase in the carrying capacity, efficiency, safety or security of existing electricity and telecommunication lines,</i></u>	Federated Farmers accepts the Section 42a recommendation.

<sup>1</sup> <https://www.worksafe.govt.nz/laws-and-regulations/standards/electricity-standards-and-codes-of-practice/>

<sup>2</sup> <https://environment.govt.nz/publications/national-policy-statement-on-electricity-transmission/>

			<p><u>utilising existing support structures or replacement structures, and where the effects of the utility remain the same or similar in character, scale and intensity as those that existed prior to the commencement of the minor upgrading. It includes:</u></p> <p><u>(a) adding new circuits;</u>  <u>(b) re-conductoring with higher capacity conductors;</u>  <u>(c) re-sagging of conductors; fitting longer or more efficient insulators;</u>  <u>(d) placement of support structures within a similar location as the support structure that is replaced;</u>  <u>(e) adding earthwires which may contain telecommunication lines, earthpeaks and lighting rods;</u>  <u>(f) adding electrical or telecommunication fittings;</u>  <u>(g) replacement of existing cross arms, including cross arms of different design but similar scale; and</u>  <u>(f) installation of fibre-optic cables onto existing transmission lines.</u></p> <p><u>It excludes any increase in the voltage of a line, unless the line was originally constructed to operate at the higher voltage.</u></p>	
Definition:	<p>FS25.3 Oppose</p> <p>FS25.4 Oppose</p> <p>FS25.5 Oppose</p>	<p>S117.022 Chorus New Zealand Ltd</p> <p>S118.022 Spark New Zealand Ltd</p> <p>S119.022 Vodafone New Zealand Ltd</p>	<p>Paragraph 14.3.27, add a new definition for Minor Upgrading:</p> <p><u>MINOR UPGRADING means an increase in the carrying capacity, efficiency, safety or security of existing electricity and telecommunication lines, utilising existing support structures or replacement structures, and where the effects of the utility remain the same or similar in character, scale and intensity as those that existed prior to the commencement of the minor upgrading. It includes:</u></p>	<p>Federated Farmers accepts the Section 42a recommendation.</p>

		<p><i>(a) adding new circuits;</i></p> <p><i>(b) re-conductoring with higher capacity conductors;</i></p> <p><i>(c) re-sagging of conductors; fitting longer or more efficient insulators;</i></p> <p><i>(d) placement of support structures within a similar location as the support structure that is replaced;</i></p> <p><i>(e) adding earthwires which may contain telecommunication lines, earthpeaks and lighting rods;</i></p> <p><i>(f) adding electrical or telecommunication fittings;</i></p> <p><i>(g) replacement of existing cross arms, including cross arms of different design but similar scale; and</i></p> <p><i>(h) installation of fibre-optic cables onto existing transmission lines.</i></p> <p><i>It excludes any increase in the voltage of a line, unless the line was originally constructed to operate at the higher voltage.</i></p>	
--	--	--	--

