



19 November 2020

Porirua City Council
PO Box 50218
Porirua 5240

Via Isovist Submission Tool

Dear Sir/Madam

Porirua Proposed District Plan Submission

This submission on the Porirua Proposed District Plan (PDP) is on behalf of Spark, Vodafone and Chorus, all telecommunication service providers (and therefore network utility operators) in New Zealand and recognised as requiring authorities by the Ministry for the Environment (MfE) under the Resource Management Act 1991

It is the strong view of the telecommunication companies and other network utility providers that network utility provisions in District Plans should be reasonably consistent across the country. In regard to building and maintaining critical utility networks, there is little variation across New Zealand. As national telecommunication network operators they depend on reasonable consistency of provisions to enable New Zealanders to access the digital world to be successful, communicate and excel locally and globally.

Historically, and to a degree currently, national network utility operators, including the telecommunication companies, face variation in regional and district planning regimes across New Zealand. This effects their ability to efficiently rollout new technology, even with the 2016 expanded National Environmental Standards for Telecommunication Facilities. Generally, telecommunications infrastructure contains the same features and is of the similar size across the country, however bespoke rules generate increase costs, delays and uncertainty for the industry that is constantly upgrading or rolling new technology (such as the imminent rollout of 5G mobile telecommunications).

The ongoing dialogue that Council has had with the telecommunications throughout the development of the PDP is appreciated, and through reviewing the PDP it is seen that those discussions have been absorbed by Council.

To that end, the submission does identify opportunities to amend provisions, and the telecommunications are open to continue working with Council to resolve these issues, ideally ahead of the PDP being heard.

I look forward to hearing from you.

Yours sincerely,



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Spark

Porirua's Proposed District Plan 2020

Submission on Porirua's Proposed District Plan

To - Environment and City Planning Team

Date received 19/11/2020

Submission Reference Number #51

Wishes to be heard? Yes

Is willing to present a joint case? Yes

Could gain an advantage in trade competition in making this submission? No

Directly affected by an effect of the subject matter of the submission? Yes

Address for service:

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Submission points

Point 51.1

Support / Support in part / Oppose

Support

Section: General Approach

Sub-section: District Plan framework

Provision

Once you have done this, users should check if there are any national environmental standards that relate to your proposal (what activity you are wanting to do, or what application you are assessing). The National Environmental Standards chapter and Table 2 below provides an overview of the national environmental standards that are in force. In most cases National Environmental Standards contain regulations that override or apply in addition to rules in the District Plan; however, there are some instances where the District Plan can have more stringent rules. In the event that there is conflict between the rules in the District Plan and the rules in a National Environmental Standards, the most restrictive rule will prevail. If the National Environmental Standards does not regulate an activity then the District Plan rule will apply.

Submission

Clear guidance as to how the PDP and NESs interact

Relief sought

N/A

Point 51.2

Support / Support in part / Oppose

Support

Section: Definitions

Sub-section: Definitions
Provision

Reverse sensitivity means the vulnerability of an existing lawfully established activity to other activities in the vicinity which are sensitive to adverse environmental effects that may be generated by such existing activity, thereby creating the potential for the operation of such existing activity to be constrained.

Submission

Support the definition of reverse sensitivity

Relief sought

N/A

Point 51.3

Support / Support in part / Oppose

Support

Section: Definitions
Sub-section: Definitions
Provision

Customer connection line means a line that connects a telecommunications or electricity distribution network to a site, including any connection to a building within that site, for the purpose of enabling a network utility operator to provide telecommunication or electrical services to a customer.

Submission

Definition reflects NESTF, but appropriately widened to allow other network utility providers

Relief sought

N/A

Point 51.4

Support / Support in part / Oppose

Support

Section: Definitions
Sub-section: Definitions
Provision

Network utility operator has the same meaning as in s166 of the RMA:
means a person who—

- a. undertakes or proposes to undertake the distribution or transmission by pipeline of natural or manufactured gas, petroleum, biofuel, or geothermal energy; or
- b. operates or proposes to operate a network for the purpose of—
 - i. telecommunication as defined in section 5 of the Telecommunications Act 2001; or
 - ii. radiocommunication as defined in section 2(1) of the Radiocommunications Act 1989; or
- c. is an electricity operator or electricity distributor as defined in section 2 of the

Electricity Act 1992 for the purpose of line function services as defined in that section; or

NPS definition

- d. undertakes or proposes to undertake the distribution of water for supply (including irrigation); or
- e. undertakes or proposes to undertake a drainage or sewerage system; or
- f. constructs, operates, or proposes to construct or operate, a road or railway line; or
- g. is an airport authority as defined by the Airport Authorities Act 1966 for the purposes of operating an airport as defined by that Act; or
- h. is a provider of any approach control service within the meaning of the Civil Aviation Act 1990; or
- i. undertakes or proposes to undertake a project or work prescribed as a network utility operation for the purposes of this definition by regulations made under this Act,—

and the words network utility operation have a corresponding meaning.

Submission

Support including RMA definition of Network Utility Operator to provide clarity for plan users

Relief sought

N/A

Point 51.5

Support / Support in part / Oppose

Support

Section: Definitions

Sub-section: Definitions

Provision

Radiocommunication has the same meaning as given in section 2 of the Radiocommunications Act 1989:

means any transmission or reception of signs, signals, writing, images, sounds, or intelligence of any nature by radio waves.

Submission

Support the replication of Radiocommunications Act definition as it provides clarity to plan users

Relief sought

N/A

Point 51.6

Support / Support in part / Oppose

Amend

Section: Definitions

Sub-section: Definitions

Provision

Upgrading As it applies to infrastructure, means the improvement or increase in carrying capacity, operational efficiency, security or safety of existing infrastructure, but excludes maintenance and repair.

Submission

The definition is unnecessary as the upgrading standard in the Infrastructure Chapter provides clarity as to what upgrading is

Relief sought

Delete the definition

Point 51.7

Support / Support in part / Oppose

Support in part

Section: Definitions

Sub-section: Definitions

Provision

Tower has the same meaning as given in the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009:

- a. means a steel-lattice structure that supports conductors as part of a transmission line; and
- b. includes the hardware associated with the structure (such as insulators, cross-arms, and guy-wires) and the structure's foundations.

Submission

Support the definition, but more could be done to separate it from being confused with telecommunications structures

Relief sought

Electricity Transmission Tower has the same meaning as given in the **Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009:**

- a. means a steel-lattice structure that supports conductors as part of a transmission line; and
 - b. includes the hardware associated with the structure (such as insulators, cross-arms, and guy-wires) and the structure's foundations.
-

Point 51.8

Support / Support in part / Oppose

Support

Section: Definitions

Sub-section: Definitions

Provision

Temporary infrastructure means infrastructure established on a temporary basis intended to provide services, or supplement existing services, for a defined or undefined period of time, where:

- a. there is or will be a disruption to necessary services provided by existing infrastructure as a result of unforeseen circumstances or planned maintenance or upgrading; or
- b. the temporary infrastructure is to provide necessary services in advance of the provision of permanent infrastructure.

Submission

Support as the definition provides clarity to plan users

Relief sought

N/A

Point 51.9**Support / Support in part / Oppose**

Support

Section: Definitions

Sub-section: Definitions

Provision**Infrastructure**

has the same meaning as in section 2 of the RMA:

means—

- a. pipelines that distribute or transmit natural or manufactured gas, petroleum, biofuel, or geothermal energy;
- b. a network for the purpose of telecommunication as defined in section 5 of the Telecommunications Act 2001;
- c. a network for the purpose of radiocommunication as defined in section 2(1) of the Radiocommunications Act 1989;
- d. facilities for the generation of electricity, lines used or intended to be used to convey electricity, and support structures for lines used or intended to be used to convey electricity, excluding facilities, lines, and support structures if a person—
 - i. uses them in connection with the generation of electricity for the person's use; and
 - ii. does not use them to generate any electricity for supply to any other person;
- e. a water supply distribution system, including a system for irrigation;
- f. a drainage or sewerage system;
- g. structures for transport on land by cycleways, rail, roads, walkways, or any other means;
- h. facilities for the loading or unloading of cargo or passengers transported on land by any means;
- i. an airport as defined in section 2 of the Airport Authorities Act 1966;
- j. a navigation installation as defined in section 2 of the Civil Aviation Act 1990;
- k. facilities for the loading or unloading of cargo or passengers carried by sea, including a port related commercial undertaking as defined in section 2(1) of the Port Companies Act 1988; and
- l. anything described as a network utility operation in regulations made for the purposes of the definition of network utility operator in section 166.

Submission

Support having RMA definition of infrastructure to provide clarity for plan users

Relief sought

N/A

Point 51.10**Support / Support in part / Oppose**

Support in part

Section: Definitions
Sub-section: Definitions
Provision

Minor earthworks means earthworks for the installation and construction of service connections, effluent disposal systems, and interments in cemeteries or urupā.

Submission

Support having minor earthworks definition, but seek that language aligns with other defined terms in the PDP

Relief sought

Minor earthworks means earthworks for the installation and construction of service connections (including customer connection lines), effluent disposal systems, and interments in cemeteries or urupa.

Point 51.11

Support / Support in part / Oppose

Support

Section: Definitions
Sub-section: Definitions
Provision

Regionally significant infrastructure means regionally significant infrastructure including:

- a. pipelines for the distribution or transmission of petroleum;
- b. the Gas Transmission Network
- c. the National Grid;
- d. facilities for the generation and/or transmission of electricity where it is supplied to the network;
- e. the local authority water supply network and water treatment plants;
- f. the local authority wastewater and stormwater networks, systems and wastewater treatment plants;
- g. the Strategic Transport Network, as identified in the operative Wellington Regional Land Transport Plan; and
- h. Radio New Zealand and NZME Radio Limited’s radio transmission facilities at Titahi Bay, designation unique identifier: RNZ-01; and
- i. facilities and structures necessary for the operation of telecommunications and radiocommunications networks operated by network utility operators.

Submission

Support the inclusion of telecommunications and radiocommunications as specifically identified Regionally Significant Infrastructure.

Relief sought

N/A

Point 51.12

Support / Support in part / Oppose

Support

Section: Definitions
Sub-section: Definitions
Provision

Cabinet

means a three-dimensional structure that houses radio and telecommunication equipment and electrical equipment associated with the operation of infrastructure, which includes single transformers and associated switching gear distributing electricity at a voltage up to and including 110KV.

Submission

Definition reflects NESTF, with appropriate addition of other network utilities who use cabinets

Relief sought

N/A

Point 51.13

Support / Support in part / Oppose

Support in part

Section: Definitions
Sub-section: Definitions
Provision

Trenching

means the excavation of trenches for underground infrastructure, including the Three Waters Network, communications, electricity and gas transmission and distribution, and any other network utilities.

Submission

Support the definition, but seek alignment with other defined terms in the PDP

Relief sought

Trenching

means the excavation of trenches for underground infrastructure, including the Three Waters Network, telecommunications and radio communications, electricity and gas transmission and distribution, and any other network utilities.

Point 51.14

Support / Support in part / Oppose

Support

Section: Definitions
Sub-section: Definitions
Provision

Maintenance and repair

means any work or activity necessary to continue the operation and / or functioning of existing infrastructure. It does not include upgrading.

Submission

Support having a clear and concise definition of maintenance and repair of infrastructure

Relief sought

N/A

Point 51.15**Support / Support in part / Oppose**

Support in part

Section: Definitions**Sub-section:** Definitions**Provision****Pole**

has the same meaning as given in the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009:

means a structure that supports conductors as part of a transmission line and that—

- a. has no more than 3 vertical supports; and
- b. is not a steel-lattice structure; and

includes the hardware associated with the structure (such as insulators, cross-arms, and guy-wires) and the structure's foundations

Submission

Support a definition of pole, but seek that NESTF definition of Pole is also included, and delete the definition of Telecommunications Pole. Consequential changes to the Infrastructure chapter will be necessary

Relief sought**Pole**

Poles for electricity transmission activities has the same meaning as given in the **Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009**:

means a structure that supports conductors as part of a transmission line and that—

- a. has no more than 3 vertical supports; and
- b. is not a steel-lattice structure; and

includes the hardware associated with the structure (such as insulators, cross-arms, and guy-wires) and the structure's foundations

Poles for telecommunciations activities has the same meaning as given in the **Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016**:

means a pole, mast, lattcie tower or similar structure of a kind that is able to be used (with or without modificatoin) to support antennas

Point 51.16**Support / Support in part / Oppose**

Support

Section: Definitions**Sub-section:** Definitions**Provision**

Telecommunication

has the same meaning as given in section 5 of the Telecommunications Act 2001:

means the conveyance by electromagnetic means from one device to another of any encrypted or non-encrypted sign, signal, impulse, writing, image, sound, instruction, information, or intelligence of any nature, whether for the information of any person using the device or not.

Submission

Support the definition of Telecommunications from the Telecommunications Act 2001, as it provides clarity for plan users

Relief sought

N/A

Point 51.17

Support / Support in part / Oppose

Support

Section: Definitions

Sub-section: Definitions

Provision

Antenna

means a device that receives or transmits radiocommunication or telecommunication signals.

It excludes:

- a. small cell units; and
- b. devices used in amateur radio configuration.

Submission

Definition reflects NESTF, with appropriate addition of amateur radio configuration

Relief sought

N/A

Point 51.18

Support / Support in part / Oppose

Support in part

Section: Definitions

Sub-section: Definitions

Provision

Telecommunication pole

means a pole, mast, lattice tower, or similar structure, of a kind that is able to be used (with or without modification) to support antennas.

Submission

Delete the definition of Telecommunications Pole and include it in the overall definition of Pole. The reason for this is that having separate definitions for Pole creates an unusual circumstance where if an existing electricity pole has telecommunications infrastructure attached to it (or vice versa) it is hard to know what type of pole it becomes. Further, there is no difference in terms of height, location controls etc whether a pole be for telecommunications or electrical purposes.

Relief sought

For clarity, the definition should be included in the earlier definition of 'Pole' as per relief sought to that definition, and Telecommunications pole be deleted

Telecommunication pole means a pole, mast, lattice tower, or similar structure, of a kind that is able to be used (with or without modification) to support antennas.

Point 51.19

Support / Support in part / Oppose

Support in part

Section: Abbreviations

Sub-section: Abbreviations

Provision

NESTF National Environmental Standards for Telecommunication Facilities

Submission

Support this abbreviation, minor update to reference most recent NESTF

Relief sought

NESTF National Environmental Standards for Telecommunication Facilities 2016

Point 51.20

Support / Support in part / Oppose

Support

Section: National Environmental Standards

Sub-section: National Environmental Standards

Provision

The following NESs are currently in force:

- Resource Management (National Environmental Standards on Plantation Forestry) Regulations 2017
- Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016
- Resource Management (National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011
- Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009
- Resource Management (National Environmental Standards for Sources of Drinking Water) Regulations 2007
- Resource Management (National Environmental Standards for Air Quality) regulations 2004 (amended 2011)

Submission

Provides clarity to plan users

Relief sought

N/A

Point 51.21

Support / Support in part / Oppose

Support

Section: FC - Functioning City

Sub-section: FC - Functioning City

Provision

FC-01 Infrastructure

Submission

Support as it clearly highlights the importance of infrastructure, and specifically recognises the importance of connectivity

Relief sought

N/A

Point 51.22

Support / Support in part / Oppose

Support

Section: FC - Functioning City

Sub-section:

Provision

FC - Functioning City

Submission

Support the Functioning City strategic direction section

Relief sought

N/A

Point 51.23

Support / Support in part / Oppose

Support

Section: UFD - Urban Form and Development

Sub-section: UFD - Urban Form and Development

Provision

Future urban growth areas are able to be serviced by infrastructure that has sufficient capacity to accommodate the form and type of development anticipated.

Submission

Support the recognition that sufficient infrastructure is necessary to support FUDs

Relief sought

N/A

Point 51.24**Support / Support in part / Oppose**

Support

Section: INF - Infrastructure**Sub-section:** Policies**Provision**

INF-P21 Upgrades to and new infrastructure in Special Amenity Landscapes

Except as provided for by INF-P6 and INF-P7, only allow for upgrades to existing infrastructure and for new infrastructure within Special Amenity Landscapes where:

1. Any significant adverse effects are avoided, and any other adverse effects are avoided, remedied or mitigated and the identified characteristics and values of the Special Amenity Landscapes described in SCHED10 - Special Amenity Landscapes are maintained; and
2. There is an operational need or functional need that means the infrastructure's location cannot be avoided;
3. There are feasible methods to mitigate the adverse effects of the activity on the landscape and reduce the visual impact, including through:
 - a. Grouping or dispersing structures;
 - b. Undergrounding; and
 - c. Locations that reduce visibility.
4. The design methods used minimise the adverse visual effects of the infrastructure, including:
 - a. Landscaping and screening;
 - b. Design, location, height, bulk and colour;
 - c. Any light spill effects;
 - d. Reflectivity effects; and
5. The scale of earthworks and indigenous vegetation removal is minimised and any exposed areas are treated to minimise adverse off-site effects.

Submission

Support that there is a pathway the considers functional need and operational need.

Relief sought

N/A

Point 51.25**Support / Support in part / Oppose**

Support

Section: INF - Infrastructure**Sub-section:** Policies**Provision**

Recognise the operational needs and functional needs of Regionally Significant Infrastructure and other infrastructure by having regard to the following matters when making decisions on new infrastructure and the maintenance and repair and upgrading of existing infrastructure:

1. The extent to which;
 - a. The infrastructure integrates with, and is necessary to support, planned urban development;

- b. The potential for significant adverse effects have been minimised through site, route or method selection, and
 - c. The ability to avoid, remedy or mitigate adverse effects of infrastructure is constrained by functional and operational needs;
2. The time, duration or frequency of adverse effects;
 3. The necessity of the infrastructure including:
 - a. The need to quickly repair and restore disrupted services; and
 - b. The impact of not operating, repairing, maintaining, upgrading, removing or developing infrastructure;
 4. The location and operational needs and functional needs of existing infrastructure including:
 - a. The complexity and connectedness of networks and services; and
 - b. The potential for co-location and shared use of infrastructure corridors; and
 5. Anticipated outcomes for the receiving environment and the purpose, character and amenity values of the zone in which it is located.

Submission

This policy appropriately identifies why infrastructure in some instances must be located in a specific location

Relief sought

N/A

Point 51.26

Support / Support in part / Oppose

Support in part

Section: INF - Infrastructure

Sub-section: Policies

Provision

INF-P23 Upgrades to and new infrastructure in Natural Hazard Overlays and Coastal Hazard Overlays

Only allow for upgrades to existing and new infrastructure in Natural Hazard Overlays and Coastal Hazard Overlays where the infrastructure:

1. Does not increase the risk from the natural hazard to people, or other property or infrastructure;
2. Has a functional need or operational need that means the infrastructure's location cannot be avoided and there are no reasonable alternatives;
3. Is not vulnerable to the natural hazard;
4. Does not result in a reduction in the ability of people and communities to recover from a natural hazard event; and
5. Is designed to maintain reasonable and safe operation during and in the immediate period after a natural hazard event.

Submission

Support that there is a pathway the considers functional need and operational need. The Council should not be concerned about the vulnerability of the infrastructure to the natural hazard, or its ability to maintain reasonable and safe operation during and after an event - these are matters for the asset owner. The infrastructure may be necessary to provide services to communities outside of times when a natural event has occurred (or in the aftermath of an event), and when such an event occurs, temporary infrastructure could be used as an alternative.

Relief sought

INF-P23 Upgrades to and new infrastructure in [Natural Hazard Overlays](#) and [Coastal Hazard Overlays](#)

Only allow for upgrades to existing and new infrastructure in [Natural Hazard Overlays](#) and [Coastal Hazard Overlays](#) where the infrastructure:

1. Does not increase the risk from the natural hazard to people, or other property or infrastructure;
2. Has a functional need or operational need that means the infrastructure's location cannot be avoided and there are no reasonable alternatives;
3. ~~Is not vulnerable to the natural hazard;~~
4. Does not result in a reduction in the ability of people and communities to recover from a natural hazard event; and
5. ~~Is designed to maintain reasonable and safe operation during and in the immediate period after a natural hazard event.~~

Point 51.27

Support / Support in part / Oppose

Support

Section: INF - Infrastructure

Sub-section: Policies

Provision

Enable the trimming, pruning and activities within the root protection area of a tree identified in SCHED5 - Notable Trees for the purpose of operating, maintaining and repairing, upgrading and removing existing infrastructure and any new infrastructure where:

1. For existing infrastructure, the work is required to comply with the Electricity (Hazards from Trees) Regulations 2003 or the Telecommunications Act 2001; or
2. For new infrastructure, there is an operational need or functional need that means the infrastructure's location cannot be avoided; and
3. For both new and existing infrastructure, the work will not compromise the long-term health, natural life or identified values of the notable tree.

Submission

Support that there is a pathway the considers functional need and operational need.

Relief sought

N/A

Point 51.28

Support / Support in part / Oppose

Support

Section: INF - Infrastructure

Sub-section: Policies

Provision

Except as provided for by INF-P6 and INF-P7, only allow upgrades to existing infrastructure where, and avoid new infrastructure in areas identified in SCHED9 - Outstanding Natural Feature and Landscape or SCHED11 - Coastal High Natural Character Area, unless it can be demonstrated that:

1. There is an operational need or functional need that means the infrastructure's location cannot be avoided, and there are no reasonable alternatives;
2. The design and location of the infrastructure is subordinate to and does not compromise the identified characteristics and values of the Outstanding Natural Feature or Landscape described in SCHED9 - Outstanding Natural Features or Landscapes or Coastal High Natural Character Area described in SCHED11 - Coastal High Natural Character Areas;
3. The natural components of the Outstanding Natural Feature or Landscape or Coastal High Natural Character Area will continue to dominate over the influence of human activity; and
4. Any significant adverse effects are avoided, and any other adverse effects are avoided, remedied or mitigated, while also having regard to the matters in NFL-P3 and NFL-P6 and CE-P3.

Submission

Support that there is a pathway the considers functional need and operational need.

Relief sought

N/A

Point 51.29

Support / Support in part / Oppose

Support

Section: INF - Infrastructure

Sub-section: Policies

Provision

Except as provided for by INF-P6 and INF-P7, only allow for upgrades to existing infrastructure and for new infrastructure in areas identified in SCHED7 - Significant Natural Areas where it can be demonstrated that:

1. There is an operational need or functional need that means the infrastructure's location cannot be avoided; and
2. Any adverse effects on indigenous biodiversity values within areas identified in SCEHD7 - Significant Natural Areas are addressed in accordance with ECO-P2 and the matters in ECO-P4, ECO-P11 and ECO-P12.

Submission

Support that there is a pathway the considers functional need and operational need, balanced with SNA values

Relief sought

N/A

Point 51.30

Support / Support in part / Oppose

Support

Section: INF - Infrastructure

Sub-section: Policies

Provision

Recognise the benefits of new technology in infrastructure that:

1. Improves access to, and efficient use of, networks and services;
2. Allows for the re-use of redundant services and structures;
3. Increases resilience or reliability of networks and services;
4. Protects the on-going safety of the community and the integrity of the network; or
5. Results in environmental benefits or enhancements.

Submission

The policy clearly anticipates that the technology for infrastructure will change over the lifespan of the Plan, and provides for explicit consideration of the benefits that this may have.

Relief sought

N/A

Point 51.31**Support / Support in part / Oppose**

Support

Section: INF - Infrastructure**Sub-section:** Policies**Provision**

Recognise the social, economic, environmental and cultural benefits of Regionally Significant Infrastructure, including:

1. The safe, secure and efficient transmission and distribution of gas and electricity that gives people access to energy to meet their needs;
2. An integrated, efficient and safe transport network, including the rail network and the state highways, that allows for the movement of people and goods;
3. Effective, reliable and future-proofed communications networks and services, that gives people access to telecommunication and radiocommunication services; and
4. Safe and efficient water, wastewater and stormwater treatment systems, networks and services, which maintains public health and safety.

Submission

Policy is clear and concise, recognising the importance of current and future telecommunication and radio communication networks

Relief sought

N/A

Point 51.32**Support / Support in part / Oppose**

Support

Section: INF - Infrastructure**Sub-section:** Policies**Provision**

Only allow upgrades to existing infrastructure and new infrastructure on or within heritage items, heritage settings and historic heritage sites, identified in SCHED2 - Historic Heritage Items (Group A), SCHED3 - Historic Heritage Items (Group B), SCHED4 - Historic Heritage Sites or sites or areas identified in SCHED6 - Sites and Areas of Significance to Māori where it can be demonstrated that:

1. There is an operational need or functional need that means the infrastructure's location cannot be avoided; and
2. The upgrade to existing infrastructure and new infrastructure will protect and maintain the particular heritage and/or cultural values of that building, site, area, item and/or feature.

Submission

Support that there is a pathway the considers functional need and operational need.

Relief sought

N/A

Point 51.33

Support / Support in part / Oppose

Support in part

Section: INF - Infrastructure**Sub-section:** Policies**Provision**

Note: Rule headings may identify whether the rule applies to areas outside of any Overlay, to all Overlay areas, or to areas within specific Overlays. Where rules do not specifically identify this, they apply across all Overlays and areas outside of any Overlay.

Note: Except as specifically identified in a rule in the following table, the rules in this chapter are the only rules that apply to infrastructure activities and no rules in other chapters apply. The exception to this is renewable electricity generation activities defined as infrastructure which are addressed in the Renewable Electricity Generation chapter.

Note: National Environmental Standards

The operation, maintenance, upgrading, relocation or removal of an electricity transmission line and ancillary structures that existed prior to 14 January 2010 and remain part of the National Grid is largely controlled by the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (NESETA). Except as provided for by these Regulations, no rules in the Plan apply to activities regulated by the NESETA. Where an activity is not regulated by the NESETA (for example the activity does not relate to an existing transmission line that is part of the National Grid, or where new transmission lines and associated structures are proposed), the rules and standards in the District Plan apply.

The installation and operation of telecommunications facilities (such as cabinets, antennas, poles, small cell-units and telecommunications lines) undertaken by a facility operator are controlled by the Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016, separate to this District Plan. The District Plan continues to apply where these telecommunications facilities are located within the following:

- SCHED2 - Historic Heritage Items (Group A)
- SCHED3 - Historic Heritage Items (Group B)
- SCHED4 - Historic Heritage Sites
- SCHED5 - Notable Trees
- SCHED6 - Sites and Areas of Significance to Māori
- SCHED7 - Significant Natural Areas
- SCHED9 - Outstanding Natural Features and Landscapes
- SCHED10 - Special Amenity Landscapes
- SCHED11 - Coastal High Natural Character Areas

Note: Noise from backup emergency generators at Radio New Zealand's Titahi Bay facilities is exempt from the noise limits in the Noise chapter. All other infrastructure must comply with the noise rules for the underlying zone.

Note: The mountings of any antenna and any radiofrequency equipment or similar device are not included in the measurement of area or diameter of each antenna, provided that the radiofrequency unit or similar device is smaller in area or diameter than the antenna itself. Any antenna only needs to meet the area or diameter measurement appropriate to the type of antenna and the measurement is of each individual antenna and is not a cumulative measurement.

Note: An activity may require consent for more than one rule in this table. Plan users are required to review all rules in this table to determine the status of an activity.

Submission

The introductory statement is supported, but minor technical correction is necessary to detail the mechanism as to how the scheduled sites apply.

The reference to the noise chapter is better located at the start of the chapter where discussion is included as to how the Infrastructure chapter interacts with other chapters in the plan, so that all cross references are held in one place.

Relief sought

Note: Rule headings may identify whether the rule applies to areas outside of any Overlay, to all Overlay areas, or to areas within specific Overlays. Where rules do not specifically identify this, they apply across all Overlays and areas outside of any Overlay.

Note: Except as specifically identified in a rule in the following table, the rules in this chapter are the only rules that apply to infrastructure activities and no rules in other chapters apply. The exception to this is renewable electricity generation activities defined as infrastructure which are addressed in the Renewable Electricity Generation chapter.

Note: National Environmental Standards

The operation, maintenance, upgrading, relocation or removal of an electricity transmission line and ancillary structures that existed prior to 14 January 2010 and remain part of the National Grid is largely controlled by the **Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009** (NESETA). Except as provided for by these Regulations, no rules in the Plan apply to activities regulated by the NESETA. Where an activity is not regulated by the NESETA (for example the activity does not relate to an existing transmission line that is part of the National Grid, or where new transmission lines and associated structures are proposed), the rules and standards in the District Plan apply.

The installation and operation of telecommunications facilities (such as cabinets, antennas, poles, small cell-units and telecommunications lines) undertaken by a facility operator are controlled by the **Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016**, separate to this District Plan. The following District Plan scheduled areas are considered NES subpart 5 matters, and as such, under the mechanism of the NES ~~The District Plan continues to apply~~ ies if where these telecommunications facilities are located within the following:

- [SCH2 - Historic Heritage Items \(Group A\)](#)
- [SCH3 - Historic Heritage Items \(Group B\)](#)
- [SCH4 - Historic Heritage Sites](#)
- [SCH5 - Notable Trees](#)
- [SCH6 - Sites and Areas of Significance to Maori](#)
- [SCH7 - Significant Natural Areas](#)
- [SCH9 - Outstanding Natural Features and Landscapes](#)
- [SCH10 - Special Amenity Landscapes](#)
- [SCH11 - Coastal High Natural Character Areas](#)

~~Note: Noise from backup emergency generators at Radio New Zealand's Titahi Bay facilities is exempt from the noise limits in the [Noise](#) chapter. All other infrastructure must comply with the noise rules for the underlying zone.~~

Note: The mountings of any antenna and any radiofrequency equipment or similar device are not included in the measurement of area or diameter of each antenna, provided that the radiofrequency unit or similar device is smaller in area or diameter than the antenna itself. Any antenna only needs to meet the area or diameter measurement appropriate to the type of antenna and the measurement is of each individual antenna and is not a cumulative measurement.

Note: An activity may require consent for more than one rule in this table. Plan users are required to review all rules in this table to determine the status of an activity.

Point 51.34

Support / Support in part / Oppose

Support

Section: INF - Infrastructure

Sub-section: Objectives

Provision

INF-O1 The benefits of Regionally Significant Infrastructure

Submission

Support

Relief sought

N/A

Point 51.35

Support / Support in part / Oppose

Support in part

Section: INF - Infrastructure

Sub-section: Objectives

Provision

INF-O5 Providing for infrastructure

Infrastructure provides benefits to people and communities and is established, operated, maintained and repaired, and upgraded efficiently, securely and sustainably, while the adverse effects of infrastructure are avoided, remedied or mitigated, including effects on:

1. The anticipated character and amenity values of the relevant zone;
2. The identified values and qualities of any Overlay; and
3. The change in risk to people's lives and damage to adjacent property and other infrastructure from natural hazards.

Submission

Support the direction that the Objective is heading in, but recognition of functional need and operational need is important when avoiding, remedying or mitigating adverse effects. Given that the three specific matters identified are for *including effects on* rather than limiting to solely those effects, no need to include the list is seen. Network utilities should be avoiding, remedying or mitigating all actual and potential adverse effects, within the limits of their functional and operational needs.

Relief sought

INF-O5 Providing for infrastructure

Infrastructure provides benefits to people and communities and is established, operated, maintained and repaired, and upgraded efficiently, securely and sustainably, while the adverse effects of infrastructure are avoided, remedied or mitigated, while recognising the functional need and operational need of infrastructure. ~~including effects on:~~

1. The anticipated character and amenity values of the relevant zone;
 2. The identified values and qualities of any Overlay; and
 3. The change in risk to people's lives and damage to adjacent property and other infrastructure from natural hazards
-

Point 51.36

Support / Support in part / Oppose

Support in part

Section: INF - Infrastructure

Sub-section: INF - Infrastructure

Provision

Note: Except as specifically identified in an objective, policy or rule, the objectives, policies and rules in this chapter and the Strategic Direction objectives, and those contained in the following chapters where relevant, are the only objectives, policies and rules that apply to infrastructure activities and no objectives, policies and rules in other chapters apply:

1. Contaminated land;
2. Hazardous substances;
3. Renewable Electricity Generation.

Submission

Clear that zone based chapters, and overlay chapters do not apply to Network Utilities, and clear as to what other chapters to apply. As it is stated in the introduction to the rule framework that the noise chapter applies, this should be included as a cross reference in this section.

Relief sought

Note: Except as specifically identified in an objective, policy or rule, the objectives, policies and rules in this chapter and the Strategic Direction objectives, and those contained in the following chapters where relevant, are the only objectives, policies and rules that apply to infrastructure activities and no objectives, policies and rules in other chapters apply:

1. Contaminated land;
 2. Hazardous substances;
 3. Renewable Electricity Generation.
 4. Noise
-

Point 51.37

Support / Support in part / Oppose

Support

Section: INF - Infrastructure

Sub-section: Objectives

Provision

INF-O3 Availability of infrastructure to meet existing and planned needs

Safe, efficient, and resilient infrastructure is available to meet the needs of, and is well integrated with, existing and planned subdivision, use and development.

Submission

Provides clarity for plan users as to expectations and outcomes of future development

Relief sought

N/A

Point 51.38

Support / Support in part / Oppose

Support

Section: INF - Infrastructure

Sub-section: Policies

Provision

INF-S5 **Height – Building mounted antennas and associated support structures (not regulated by the NESTF)**

Submission

The height provisions allowed are appropriate

Relief sought

N/A

Point 51.39

Support / Support in part / Oppose

Support in part

Section: INF - Infrastructure

Sub-section: Policies

Provision

All zones	<ol style="list-style-type: none"> 1. The realignment, relocation or replacement of a telecommunication line, any pipe (excluding a gas transmission pipeline), pole, tower, conductor, cross arm, switch, transformer or ancillary structure must be within 5m of the existing alignment or location. 2. A pole must not be replaced with a tower. 3. The height of a replacement pole, tower or telecommunication pole must not exceed whichever is the lesser of: <ol style="list-style-type: none"> a. 25m; or b. The height of the replaced pole or tower or telecommunication pole as of 28 August 2020 plus 30%; <p>Except that, if the existing pole, tower or</p>	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. Local, regional and national benefits of the infrastructure; 2. Any adverse effects on the streetscape and the amenity values of the area; 3. The amenity of adjoining sites; 4. Design and siting of the infrastructure; 5. Any operational or functional needs of the infrastructure; and 6. Any topographical and other site constraints make compliance with the permitted standard impractical.
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telecommunication pole is greater than 25m in height, the height of the replacement pole, tower or telecommunication pole must be no higher than the existing pole, tower or telecommunication pole.

4. The diameter or width of a replacement pole or telecommunication pole:

- a. Must not exceed twice that of the replaced pole at its widest point as of 28 August 2020; or
- b. Where a single pole is replaced with a pi pole, the width of the pi pole structure must not exceed three times the width of the replaced pole as of 28 August 2020 at its widest point.

5. A replacement tower's footprint must not exceed the width of the tower as of 28 August 2020 by more than 25%.

6. The diameter of a replacement conductor or line must not exceed the diameter of the replaced conductor or line or 50mm, whichever is the greater.

7. Additional conductors or lines:

- a. Must not increase the number of conductors or lines as of 28 August 2020 by more than 100%; and
- b. Must not exceed a 50mm diameter.

8. There must be no additional towers.

9. The number of additional poles required to achieve the conductor clearances required by NZECP 34:2001 must not exceed two.

10. Additional cross arms must not exceed the length of the existing cross arm as of 28 August 2020 by more than 100%, up to a maximum of 4m.

11. The diameter of replacement pipes located aboveground must not exceed the diameter of the replaced pipe by more than 300mm.

12. The realignment, relocation or replacement of any other infrastructure structure or building:

- a. Must be within 5m of the alignment or location of the original structure or building;
- b. Must not increase the footprint of structure or building as of 28 August 2020 by greater than 30%.

13. A replacement panel antenna must not increase the face area as of 28 August 2020 by more than 20%.

14. A replacement dish antenna must not increase in diameter as of 28 August 2020 by more than 20%.

Submission

Support, particularly subrule 3, but wording could be refined

Relief sought

INF-S1	Upgrading
<p>All zones</p>	<p>1. The realignment, relocation or replacement of a telecommunication line, any pipe (excluding a gas transmission pipeline), pole, tower, conductor, cross arm, switch, transformer or ancillary structure must be within 5m of the existing alignment or location.</p> <p>2. A pole must not be replaced with a tower.</p> <p>3. The height of a replacement pole, tower or telecommunication pole must not exceed <u>the height of the pole, tower, or telecommunication pole which is being replaced, or whichever is the lesser of:</u></p> <ul style="list-style-type: none"> a. 25m; or b. The height of the replaced pole or tower or telecommunication pole as of 28 August 2020 plus 30%; <p>Except that, if the existing pole, tower or telecommunication pole is greater than 25m in height, the height of the replacement pole, tower or telecommunication pole must be no higher than the existing pole, tower or telecommunication pole.</p> <p>4. The diameter or width of a replacement pole or telecommunication pole:</p>

- Matters of discretion are restricted to:
1. Local, regional and national benefits of the infrastructure;
 2. Any adverse effects on the streetscape and the amenity values of the area;
 3. The amenity of adjoining sites;
 4. Design and siting of the infrastructure;
 5. Any operational or functional needs of the infrastructure; and
 6. Any topographical and other site constraints make compliance with the permitted standard impractical.

- a. Must not exceed twice that of the replaced pole at its widest point as of 28 August 2020; or
 - b. Where a single pole is replaced with a pi pole, the width of the pi pole structure must not exceed three times the width of the replaced pole as of 28 August 2020 at its widest point.
5. A replacement tower's footprint must not exceed the width of the tower as of 28 August 2020 by more than 25%.
6. The diameter of a replacement conductor or line must not exceed the diameter of the replaced conductor or line or 50mm, whichever is the greater.
7. Additional conductors or lines:
- a. Must not increase the number of conductors or lines as of 28 August 2020 by more than 100%; and
 - b. Must not exceed a 50mm diameter.
8. There must be no additional towers.
9. The number of additional poles required to achieve the conductor clearances required by NZECP 34:2001 must not exceed two.
10. Additional cross arms must not exceed the length of the existing cross arm as of 28 August 2020 by more than 100%, up to a maximum of 4m.
11. The diameter of replacement pipes located aboveground must not exceed the diameter of the replaced pipe by more than 300mm.
12. The realignment, relocation or replacement of any other infrastructure structure or building:
- a. Must be within 5m of the alignment or location of the original structure or building;
 - b. Must not increase the footprint of structure or building as of 28 August 2020 by greater than 30%.

13. A replacement panel antenna must not increase the face area as of 28 August 2020 by more than 20%.

14. A replacement dish antenna must not increase in diameter as of 28 August 2020 by more than 20%.

Point 51.40

Support / Support in part / Oppose

Support

Section: INF - Infrastructure

Sub-section: Policies

Provision

INF-S6	Size and diameter – Antenna attached to a telecommunication pole (not regulated by the NESTF)
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Submission

The Antenna sizes are appropriate and align with the NESTF

Relief sought

N/A

Point 51.41

Support / Support in part / Oppose

Support

Section: INF - Infrastructure

Sub-section: Policies

Provision

INF-S8	Cabinets, electric vehicle charging stations, temporary infrastructure and temporary electricity generators and self-contained power units to supply existing infrastructure, and any other infrastructure structure or building not otherwise listed, which are located within the road reserve or rail corridor
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Submission

Directly aligns with NESTF permitted provision for legal road

Relief sought

N/A

Point 51.42

Support / Support in part / Oppose

Support

Section: INF - Infrastructure

Sub-section: Policies

Provision

INF-S3	Height – Masts, antennas, lines and single pole support structures, anemometers and extreme weather devices (not regulated by the NESTF)
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Submission

The height provisions allowed are appropriate when compared to the permitted building height in the corresponding zones

Relief sought

N/A

Point 51.43

Support / Support in part / Oppose

Support in part

Section: INF - Infrastructure

Sub-section: Policies

Provision

INF-S13	Setbacks – Cabinets, electric vehicle charging stations and temporary infrastructure and temporary electricity generators and self-contained power units to supply existing infrastructure, meteorological enclosures and buildings and any other infrastructure structure or building not otherwise listed, which is not located within the road reserve or rail corridor
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Submission

Setbacks are appropriate from private boundaries for cabinets, but if there are situations where a cabinet is located in private property but adjoins the legal road and is serviced from legal road. This can occur in situations where the legal road width is narrow, and a cabinet within legal road could unduly effect vehicles or pedestrians, so it is set into neighbouring private property. In such instances a setback from the road boundary of 2m would not lead to an appropriate visual outcome. As such, the 2m setback should not apply to any road boundary.

Relief sought

INF-S13	Setbacks – Cabinets, electric vehicle charging stations and temporary infrastructure and temporary electricity generators and self-contained power units to supply existing infrastructure, meteorological enclosures and buildings and any other infrastructure structure or building not otherwise listed, which is not located within the road reserve or rail corridor
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All zones	<p>1. It must not be located within a 2m setback from any site boundary <u>(except for any road boundary)</u>.</p>	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. Local, regional and national benefits of the infrastructure; 2. Any adverse effects on the streetscape and the amenity values of the area;
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3. The amenity of adjoining sites;
4. Design and siting of the infrastructure;
5. Any operational or functional needs of the infrastructure; and
6. Any topographical and other site constraints that make compliance with the permitted standard impractical.

Point 51.44

Support / Support in part / Oppose

Support in part

Section: NOISE - Noise

Sub-section: NOISE - Noise

Provision

The following are all exempt from the rules and standards in this chapter:

1. Aircraft being operated during flight;
2. Vehicles being driven on a road (within the meaning of section 2(1) of the Transport Act 1998), or within a site as part of or compatible with a normal residential activity;
3. Trains on rail lines (public or private) and crossing bells within the road reserve, including at railway yards, railway sidings or stations. This exemption does not apply to the testing (when stationary), maintenance, loading or unloading of trains;
4. Any warning device or siren used by emergency services for emergency purposes (and routine testing and maintenance);
5. The use of generators and mobile equipment (including vehicles) for emergency purposes, including testing and maintenance not exceeding 48 hours in duration, where they are operated by emergency services or lifeline utilities, or for the continuation of radiocommunication broadcasts from Radio New Zealand's Titahi Bay facilities;
6. Activities at emergency service facilities associated with emergency response and emergency response training;
7. Farming activity, agricultural vehicles, machinery or equipment used on a seasonal or intermittent basis for primary production in the Rural Zones;
8. Helicopters used in emergencies or as air ambulances;
9. Impulsive sounds (hammerings and bangs) and dog barking noise;
10. Crowd noise from activities in Open Space and Sport and Active Recreation Zones; and
11. Temporary Activities in the City Centre, General Rural, Rural Lifestyle, Mixed Use and Local Centre Zones on New Year's Eve until 1.00am on New Year's Day only, where in accordance with the rules and standards in the Temporary Activities chapter.

Submission

Exempting the use of generators and mobile equipment from the noise provisions is supported, however a change is sought so that load shedding is also clearly exempt. Load shedding is when the electricity grid reaches crisis peak demand, and the load on the grid is such that there is risk of power cut. In such circumstances, power companies ask large power users who have their own emergency power back up (such as Telecommunication Exchanges) to switch on their generators and switch off from the grid for a short period of time, to reduce the risk of power cut. This is in no way a regular occurrence, and has effects similar to using generators for emergency purposes. As such it should clearly be exempt in the PDP.

Relief sought

The following are all exempt from the rules and standards in this chapter:

1. Aircraft being operated during flight;
2. Vehicles being driven on a road (within the meaning of section 2(1) of the Transport Act 1998), or within a site as part of or compatible with a normal residential activity;
3. Trains on rail lines (public or private) and crossing bells within the road reserve, including at railway yards, railway sidings or stations. This exemption does not apply to the testing (when stationary), maintenance, loading or unloading of trains;

4. Any warning device or siren used by emergency services for emergency purposes (and routine testing and maintenance);
5. The use of generators and mobile equipment (including vehicles) for emergency purposes, including testing and maintenance not exceeding 48 hours in duration, where they are operated by emergency services or lifeline utilities, for load shedding purposes, or for the continuation of radiocommunication broadcasts from Radio New Zealand's Titahi Bay facilities;
6. Activities at emergency service facilities associated with emergency response and emergency response training;
7. Farming activity, agricultural vehicles, machinery or equipment used on a seasonal or intermittent basis for primary production in the Rural Zones;
8. Helicopters used in emergencies or as air ambulances;
9. Impulsive sounds (hammerings and bangs) and dog barking noise;
10. Crowd noise from activities in [Open Space](#) and [Sport and Active Recreation](#) Zones; and
11. [Temporary Activities](#) in the [City Centre](#), [General Rural](#), [Rural Lifestyle](#), [Mixed Use](#) and [Local Centre](#) Zones on New Year's Eve until 1.00am on New Year's Day only, where in accordance with the rules and standards in the [Temporary Activities](#) chapter.

Point 51.45

Support / Support in part / Oppose

Support

Section: SUB - Subdivision

Sub-section: Policies

Provision

SUB-P11 Subdivision for infrastructure

Submission

Provision is appropriate

Relief sought

N/A

Point 51.46

Support / Support in part / Oppose

Support

Section: SUB - Subdivision

Sub-section: Policies

Provision

SUB-P5 Integration with infrastructure

Submission

Appropriate policy - particularly SUB-P5-5

Relief sought

N/A

Point 51.47

Support / Support in part / Oppose

Support

Section: SUB - Subdivision

Sub-section: Policies

Provision

Control boundary adjustments to ensure that:

1. The size, design and layout of the allotments is sufficient to accommodate existing development on or proposed development of the site; and
2. The design of the allotments will ensure the safe operation, maintenance and access to any Regionally Significant Infrastructure on or adjacent to the site, taking into account the outcome of consultation with the Regionally Significant Infrastructure owner.

Submission

Support, particularly requirement to consult RSI

Relief sought

N/A

Point 51.48

Support / Support in part / Oppose

Support

Section: SUB - Subdivision

Sub-section: Policies

Provision

SUB-P1 Creation of allotments

Submission

Support, particularly the requirement under SUB-P1-4

Relief sought

N/A

Point 51.49

Support / Support in part / Oppose

Support

Section: EW - Earthworks

Sub-section: EW - Earthworks

Provision

This Earthworks chapter covers general earthworks provisions in all zones. Additional earthworks provisions may apply within Overlays. These earthworks provisions have been included in the respective Overlay chapters because they address the Overlay related effects of earthworks on the identified values, characteristics, risks or features. The earthworks provisions within Overlays apply in addition to the provisions of this chapter. However, all provisions relating to earthworks associated with infrastructure are contained in the Infrastructure chapter.

Submission

Support the clarity provided in the introduction which says Infrastructure earthworks are not subject to this chapter, but Infrastructure.

Relief sought

N/A

Point 51.50

Support / Support in part / Oppose

Oppose

Section: INF - Infrastructure

Sub-section: Policies

Provision

INF-P8 Provide for Regionally Significant Infrastructure and other infrastructure outside of Overlays

Submission

Unsure as to the purpose of this policy, and do not consider that the proposed rules and standards give effect to it. In particular, the proposed rules and standards do not give effect to 1 and 2, and point 3 is very prescriptive and adverse effects on amenity values are detailed in other policies.

Relief sought

~~INF-P8 Provide for Regionally Significant Infrastructure and other infrastructure outside of Overlays~~

~~Provide for Regionally Significant Infrastructure and other infrastructure which is not located within an Overlay, where it can be demonstrated that the following matters can be achieved:-~~

- ~~1. Compatibility with the site, existing built form and landform;~~
- ~~2. Compatibility with the anticipated character and amenity values of the zone it is located in;~~
- ~~3. Any adverse effects on amenity values are minimised, taking into account:

 - ~~a. The bulk, height, size, colour, reflectivity of the infrastructure;~~
 - ~~b. Any proposed associated earthworks;~~
 - ~~c. The time, duration or frequency of any adverse effects; and~~
 - ~~d. Any proposed mitigation measures;~~~~
- ~~4. Any adverse effects on the health, wellbeing and safety of people, communities and the environment, including nuisance from noise, dust, odour emissions, light spill and sedimentation are avoided, remedied or mitigated;~~
- ~~5. Any adverse effects on the natural character and amenity of water bodies, the coast and riparian margins and coastal margins are minimised;~~
- ~~6. Public access to and along the coastal marine area and water bodies is maintained or enhanced;~~
- ~~7. Any adverse effects on any values and qualities of any adjacent Overlays are minimised;~~
- ~~8. The safe and efficient operation of any other infrastructure, including the transport network, is not compromised; and~~
- ~~9. Any adverse cumulative effects are minimised.~~

Point 51.51

Support / Support in part / Oppose

Support

Section: INF - Infrastructure

Sub-section: Policies

Provision

INF-P13 Upgrading and development of the transport network

Submission

This policy is clear, and particular support is provided for point 6(a) which ensures space for other infrastructure within road corridors

Relief sought

N/A

Point 51.52**Support / Support in part / Oppose**

Support

Section: INF - Infrastructure**Sub-section:** Policies**Provision**

INF-P5 Adverse effects on Regionally Significant Infrastructure

Submission

This policy is supported, however a rewrite covering the same matters is sought so that the Policy provides for all infrastructure in the first instance, and then details bespoke matters to the certain infrastructure such as the National Grid, rather than the other way round. This will provide greater clarity to plan users. I.e. it is better to deal with the overall direction first and then get into the specific, as opposed to the current drafting of specific first then overall.

Relief sought

INF-P5 Adverse effects on Regionally Significant Infrastructure

Protect the safe and efficient operation, maintenance and repair, upgrading, removal and development of Regionally Significant Infrastructure from being unreasonably compromised by:

1. Considering any potential adverse effects of subdivision of a site that contains or is adjacent to any Regionally Significant Infrastructure other than the National Grid, including:
 - a. The impact of subdivision layout and design on the operation, maintenance and repair, and potential upgrade and development of the infrastructure;
 - b. The extent to which the design and layout of the subdivision demonstrates that a suitable building platform(s) for a dwelling can be provided;
 - c. The extent to which the subdivision design and consequential development will minimise the potential reverse sensitivity effects on and amenity and nuisance effects of the infrastructure; and
2. Requiring subdivision of a site that contains or is adjacent to any Regionally Significant Infrastructure other than the National Grid to be designed to avoid or mitigate any adverse effects on access to, and the safe and efficient operation and maintenance and repair of, that infrastructure.
 1. Avoiding sensitive activities and building platforms located within the National Grid Yard;
 2. Only allowing subdivision within the National Grid Corridor where it can be demonstrated that any adverse effects on and from the National Grid, including public health and safety, will be avoided, remedied or mitigated, taking into account:
 - a. The impact of subdivision layout and design on the operation and maintenance, and potential upgrade and development of the National Grid;
 - b. The ability of any potential future development to comply with **NZEC 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances**;
 - c. The extent to which the design and layout of the subdivision demonstrates that a suitable building platform(s) for a

- dwelling can be provided outside of the National Grid Yard for each new lot;
- d. The risk to the structural integrity of the National Grid;
 - e. The extent to which the subdivision design and consequential development will minimise the risk of injury and/or property damage from the National Grid and the potential reverse sensitivity on and amenity and nuisance effects of the National Grid assets;
3. Only allowing sensitive activities within the Gas Transmission Pipeline Corridor where these are of a scale and nature that will not compromise the Gas Transmission Network;
 4. Requiring sensitive activities to be located and designed so that potential adverse effects of and on the Rail Corridor and State Highways are avoided, remedied or mitigated;
 5. Requiring any buildings or structures to be of a nature and scale and to be located and designed to maintain safe distances within the National Grid and Gas Transmission Network;
 6. Considering any potential adverse effects of subdivision of a site that contains or is adjacent to any Regionally Significant Infrastructure other than the National Grid, including:
 - a. The impact of subdivision layout and design on the operation, maintenance and repair, and potential upgrade and development of the infrastructure;
 - b. The extent to which the design and layout of the subdivision demonstrates that a suitable building platform(s) for a dwelling can be provided;
 - c. The extent to which the subdivision design and consequential development will minimise the potential reverse sensitivity effects on and amenity and nuisance effects of the infrastructure; and
 7. Requiring subdivision of a site that contains or is adjacent to any Regionally Significant Infrastructure other than the National Grid to be designed to avoid or mitigate any adverse effects on access to, and the safe and efficient operation and maintenance and repair of, that infrastructure.

Point 51.53

Support / Support in part / Oppose

Support

Section: INF - Infrastructure

Sub-section: Policies

Provision

INF-P16 Roads as infrastructure corridors

Submission

This is supported, as it appropriately recognises roads as infrastructure corridors.

Relief sought

N/A

Point 51.54

Support / Support in part / Oppose

Support in part

Section: INF - Infrastructure

Sub-section: Policies

Provision

INF-P4 Appropriate infrastructure

Submission

The enabling nature and points 1 and 3 of this policy is supported, however point 2 is superfluous and potentially problematic.

Above ground infrastructure in some instances cannot be compatible with anticipated character and amenity of the zone in which it is located, such as a pole in a open space or residential zone. Poles are permitted in these zones, so there is a disconnect between the policy and the rule/standard. Point 2 can be removed as adverse effects of infrastructure, including adverse effects on character and amenity, are dealt with through point 1.

Relief sought

INF-P4 Appropriate infrastructure

Enable new infrastructure and the maintenance and repair, upgrading and removal of existing infrastructure, including earthworks, that:

1. Is of a form, location and scale that minimises adverse effects on the environment;
2. ~~Is compatible with the anticipated character and amenity values of the zone in which the infrastructure is located;~~ and
3. For any maintenance and repair, or removal of existing infrastructure in any Overlay, it is of a nature and scale that does not adversely impact on the identified values and characteristics of the Overlay that it is located within.

Point 51.55

Support / Support in part / Oppose

Support in part

Section: INF - Infrastructure

Sub-section: Policies

Provision

INF-P22 Upgrades to and new infrastructure in an Outstanding Natural Features and Landscapes or Coastal High Natural Character Area

Except as provided for by INF-P6 and INF-P7, only allow upgrades to existing infrastructure where, and avoid new infrastructure in areas identified in SCHED9 - Outstanding Natural Feature and Landscape or SCHED11 - Coastal High Natural Character Area, unless it can be demonstrated that:

1. There is an operational need or functional need that means the infrastructure's location cannot be avoided, and there are no reasonable alternatives;
2. The design and location of the infrastructure is subordinate to and does not compromise the identified characteristics and values of the Outstanding Natural Feature or Landscape described in SCHED9 - Outstanding Natural Features or Landscapes or Coastal High Natural Character Area described in SCHED11 - Coastal High Natural Character Areas;
3. The natural components of the Outstanding Natural Feature or Landscape or Coastal High Natural Character Area will continue to dominate over the influence of human activity; and
4. Any significant adverse effects are avoided, and any other adverse effects are avoided, remedied or mitigated, while also having regard to the matters in NFL-P3 and NFL-P6 and CE-P3.

Submission

The policy is appropriate, but consideration should be given to lifeline utilities when considering what can be constructed in such areas

Relief sought

INF-P22 Upgrades to and new infrastructure in an Outstanding Natural Features and Landscapes or Coastal High Natural Character Area

Except as provided for by [INF-P6](#) and [INF-P7](#), only allow upgrades to existing infrastructure where, and avoid new infrastructure in areas identified in [SCHED9 - Outstanding Natural Feature and Landscape](#) or [SCHED11 - Coastal High Natural Character](#)

[Area](#), unless it can be demonstrated that:

1. There is an operational need or functional need that means the infrastructure's location cannot be avoided, or the utility is a lifeline utility, and there are no reasonable alternatives;
2. The design and location of the infrastructure is subordinate to and does not compromise the identified characteristics and values of the Outstanding Natural Feature or Landscape described in [SCHED9 - Outstanding Natural Features or Landscapes](#) or Coastal High Natural Character Area described in [SCHED11 - Coastal High Natural Character Areas](#);
3. The natural components of the [Outstanding Natural Feature or Landscape](#) or [Coastal High Natural Character Area](#) will continue to dominate over the influence of human activity; and
4. Any significant adverse effects are avoided, and any other adverse effects are avoided, remedied or mitigated, while also having regard to the matters in [NFL-P3](#) and [NFL-P6](#) and [CE-P3](#).

Point 51.56

Support / Support in part / Oppose

Support in part

Section: INF - Infrastructure

Sub-section: Policies

Provision

INF-S7 **Size and diameter – Antenna attached to buildings (not regulated by the NESTF)**

Submission

Clarification is sought as to what the area of a panel antenna is, and to align the face area sizes with standard telecommunication antenna size, which are only marginally different.

Relief sought

Note, in this instance, isovist did not copy the full provision, so changes sought are as follows:

INF-S7.1.b amend to read 1.8m² in area of any panel (largest face) if a panel antenna; or

INF-S7.2.b amend to read ~~1.51.2~~m² in area of any panel (largest face) if a panel antenna; or

INF-S7.3.b amend to read ~~1.51.2~~m² in area of any panel (largest face) if a panel antenna; or

INF-S7.4.b amend to read 1.20.8m² in area of any panel (largest face) if a panel antenna; or

INF-S7.6.b amend to read ~~1.51.2~~m² in area of any panel (largest face) if a panel antenna; o

Point 51.57

Support / Support in part / Oppose

Support in part

Section: INF - Infrastructure

Sub-section: Policies

Provision

INF-S1 Upgrading

Submission

The intent of this standard is clear, however changes are sought to remove the date reference to allow for any infrastructure which is constructed over the life of the plan to be subsequently upgraded as and when new technologies are introduced, and to align with the definition sought for pole.

Relief sought

INF-S1 Upgrading

All zones

1. The realignment, relocation or replacement of a telecommunication line, any pipe (excluding a gas transmission pipeline), pole, tower, conductor, cross arm, switch, transformer or ancillary structure must be within 5m of the existing alignment or location *[Note if the amendment to the definition of pole as sought is not accepted, then this standard should be updated to also include telecommunication pole].*

2. A pole must not be replaced with a tower.

3. The height of a replacement pole, tower or telecommunication pole must not exceed whichever is the lesser of:

- a. 25m; or
- b. ~~The height of the replaced pole or tower or telecommunication pole as of 28 August 2020 plus 30%;~~

Except that, if the existing pole, tower or telecommunication pole is greater than 25m in height, the height of the replacement pole, tower or telecommunication pole must be no higher than the existing pole, tower or telecommunication pole.

4. The diameter or width of a replacement pole or telecommunication pole:

- a. Must not exceed twice that of the replaced pole at its widest point ~~as of 28 August 2020;~~ or
- b. Where a single pole is replaced with a pi pole, the width of the pi pole structure must

Matters of discretion are restricted to:

- 1. Local, regional and national benefits of the infrastructure;
- 2. Any adverse effects on the streetscape and the amenity values of the area;
- 3. The amenity of adjoining sites;
- 4. Design and siting of the infrastructure;
- 5. Any operational or functional needs of the infrastructure; and
- 6. Any topographical and other site constraints make compliance with the permitted standard impractical.

not exceed three times the width of the replaced pole ~~as of 28 August 2020~~ at its widest point.

5. A replacement tower's footprint must not exceed the width of the tower ~~as of 28 August 2020~~ by more than 25%.
6. The diameter of a replacement conductor or line must not exceed the diameter of the replaced conductor or line or 50mm, whichever is the greater.
7. Additional conductors or lines:
 - a. Must not increase the number of conductors or lines ~~as of 28 August 2020~~ by more than 100%; and
 - b. Must not exceed a 50mm diameter.
8. There must be no additional towers.
9. The number of additional poles required to achieve the conductor clearances required by NZECP 34:2001 must not exceed two.
10. Additional cross arms must not exceed the length of the existing cross arm ~~as of 28 August 2020~~ by more than 100%, up to a maximum of 4m.
11. The diameter of replacement pipes located aboveground must not exceed the diameter of the replaced pipe by more than 300mm.
12. The realignment, relocation or replacement of any other infrastructure structure or building:
 - a. Must be within 5m of the alignment or location of the original structure or building;
 - b. Must not increase the footprint of structure or building ~~as of 28 August 2020~~ by greater than 30%.
13. A replacement panel antenna must not increase the face area ~~as of 28 August 2020~~ by more than 20%.
14. A replacement dish antenna must not increase

Point 51.58

Support / Support in part / Oppose

Support in part

Section: INF - Infrastructure

Sub-section: Policies

Provision

INF-S6 **Size and diameter – Antenna attached to a telecommunication pole (not regulated by the NESTF)**

Submission

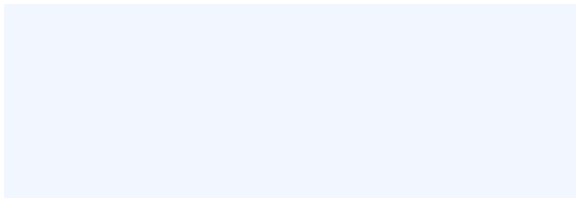
Telecommunication Pole updated to reflect changes sought to Pole definition.

Relief sought

INF-S6 **Size and diameter – Antenna attached to a telecommunication pole (not regulated by the NESTF)**

Residential Zones	5. It must be contained within a horizontal circle with a maximum diameter of 750mm.	Matters of discretion are restricted to: 1. Local, regional and national benefits of the infrastructure; 2. Any adverse effects on the streetscape and the amenity values of the area; 3. The amenity of adjoining sites; 4. Design and siting of the telecommunication pole and/or antenna; 5. Any operational or functional needs of the infrastructure; and 6. Any topographical and other site constraints make compliance with the permitted standard impractical.
Rural Lifestyle Zone	6. If a panel antenna it must not exceed:	
Settlement Zone	a. A width of 0.7m; and b. A length of 3.5m.	
Neighbourhood Centre Zone	7. If a dish antenna it must not exceed a diameter of 0.38m.	
Local Centres Zone	8. If an omni directional 'whip' antenna or dipole antenna it must not exceed:	
Mixed Use Zone	a. A vertical length of 1.6m; and b. A diameter of 60mm.	
City Centre Zone		
Open Space and Recreation Zones		

Special Purpose Zone
(BRANZ)



Hospital Zone

Point 51.59

Support / Support in part / Oppose

Support in part

Section: INF - Infrastructure

Sub-section: Policies

Provision

INF-S16 Earthworks – In relation to Historic Heritage and Sites and Areas of Significance to Māori

Submission

Support the standard, however clarity should be provided that alternatives to trenching, such as directional drilling and other similar methods, are provided

Relief sought

INF-S16 Earthworks – In relation to Historic Heritage and Sites and Areas of Significance to Maori

All zones

1. The earthworks are limited to trenching less than 600mm in width or alternative methods such as directional drilling, directly above existing underground infrastructure

There are no matters of discretion for this standard.

Point 51.60

Support / Support in part / Oppose

Support in part

Section: INF - Infrastructure

Sub-section: Policies

Provision

INF-S15 Earthworks – Area limit in a 12 month period per site, excluding the road reserve and rail corridor

Submission

The area for which earthworks in the rural zone are permitted should be increased from 1000sqm to 2500sqm in line with other plans. This will allow tracks that are used to service infrastructure to be upgraded.

Relief sought

Under S15.4 4000m² to 2500m²

Point 51.61

Support / Support in part / Oppose

Support in part

Section: INF - Infrastructure

Sub-section: Policies

Provision

INF-S14 Earthworks – Slope, height, depth and location

Submission

This standard is supported, particularly S14-4 re trenching. There are instances when trenches need to be deeper than 1m, and it is understood that this depth does not create any different environmental effects to a 1m trench. A minor change is sought

Relief sought

INF-S14 Earthworks – Slope, height, depth and location

All zones

1. Earthworks must not be undertaken on an existing slope with an angle of 34° or greater.
2. Earthworks must not exceed 1.5m in cut height or fill depth, except:
 - a. Where the earthworks are for trenching for the construction, operation, maintenance and repair, removal or upgrade of underground infrastructure; and
 - b. Where the earthworks are associated with switchback sections for the development of new and maintenance of existing walkways, cycleways and shared paths that are located on public land other than a road.
3. Earthworks must not be located within 1.0m of the site boundary, measured on a horizontal plane except:
 - a. Where the earthworks are for trenching for the construction, operation, maintenance and repair, removal or upgrade of underground infrastructure; or
 - b. Where the site boundary separates adjoining sites which are both within the area of land subject to the proposed works.
4. Trenching for the construction, operation, maintenance and repair, removal or upgrade of underground infrastructure undertaken within 1.0m

Matters of discretion are restricted to:

1. Local, regional and national benefits of the infrastructure;
2. The natural character of any riparian margin or coastal margin;
3. Design and siting of the infrastructure;
4. Any operational or functional needs of the infrastructure;
5. Retention of silt and sediment on the site;
6. Any topographical and other site constraints that make compliance with the permitted standard impractical; and
7. The matters in [EW-P1](#).

of the site boundary must not exceed 1.5m in depth.

5. Earthworks associated with the development of new and maintenance of existing walkways, cycleways and shared paths that are located on public land other than a road must not exceed 1.8m cut height or fill depth on switchback sections of the pathway, measured vertically, where the activities are undertaken by:

- a. Porirua City Council;
- b. Greater Wellington Regional Council;
- c. Department of Conservation; or
- d. A nominated contractor or agent of an organisation listed in (a) to (c).

6. Earthworks must not be carried out within 5m of a river, except:

- a. Where the earthworks are for the installation, maintenance and repair, removal or upgrade of infrastructure located on or within existing bridges or structure crossing a stream.

7. As soon as practical, but no later than three months after the completion of the works, the earthworks area must be stabilised with vegetation or sealed, paved, metaled or built over.

8. All silt and sediment must be retained on the site.

9. Silt and sediment devices must be installed in accordance with [APP15 - Silt and Sediment Devices](#) prior to the commencement of earthworks and must be retained for the duration of the earthworks.

This standard does not apply to:

- Earthworks undertaken by Transpower to achieve the ground to conductor clearance required by NZECP34:2001;
- Any earthworks associated with any maintenance and repair works for walkways, cycleways and shared paths within road reserves;
- Any earthworks associated with any building or structure used for infrastructure purposes

that are within 2m of the exterior walls of the building or structure, measured in plan view; or

- Any piling associated with a support structure that is within 2m of an existing support structure or necessary to install a support structure.

Point 51.62

Support / Support in part / Oppose

Support in part

Section: INF - Infrastructure

Sub-section: Policies

Provision

All zones

- | | |
|---|--|
| <ol style="list-style-type: none"> 1. Any trimming or pruning: <ol style="list-style-type: none"> a. Must not exceed a branch diameter of 50mm at severance unless it is the removal of deadwood; b. Retains the natural shape, form and branch habitat of the tree; and c. Is undertaken or supervised by a works arborist.
 2. Works within the root protection area must only undertaken where: <ol style="list-style-type: none"> a. The works are undertaken or supervised by a technician arborist; b. Any machinery associated with undertaking the earthworks is operated on top of paved surfaces and/or ground protection measures; c. Any excavation is undertaken by: <ol style="list-style-type: none"> i. Hand-digging, air spade, or hydro vac; or ii. Drilling machine at a depth of 1m or greater; d. The pruning of roots is limited to roots 35mm in diameter or less at the point of severance; and e. The works do not create new impermeable surfaces (including sealing, paving, soil compaction), buildings or structures within the root protection area; and f. The works will affect less than 10% of the protected root zone.
 3. Removal of a tree must only be undertaken where: <ol style="list-style-type: none"> a. It is essential due to a serious imminent | <p>There are no matters of discretion for this standard.</p> |
|---|--|

- threat to the safety of people or property;
- b. The tree is confirmed to be dead or in terminal decline by a technician arborist;
- c. Porirua City Council is advised as soon as reasonably practicable prior to work commencing;
- d. The works are undertaken or supervised by a technician arborist; and
- e. Porirua City Council is provided with written documentation by a technician arborist confirming that the works were necessary and undertaken in accordance with good arboricultural practice no more than 10 working days after the works have been completed.

Submission

There are instances when roots require pruning for underground lines. Relief is sought to recognise this within the standard.

Relief sought

INF-S19 **Trimming, pruning, removal or works within the root protection area of a tree identified in [SCHED5 - Notable Trees](#)**

All zones

1. Any trimming or pruning:
 - a. Must not exceed a branch or root diameter of 50mm at severance unless it is the removal of deadwood;
 - b. Retains the natural shape, form and branch habitat of the tree; and
 - c. Is undertaken or supervised by a works arborist.

2. Works within the root protection area must only undertaken where:
 - a. The works are undertaken or supervised by a technician arborist;
 - b. Any machinery associated with undertaking the earthworks is operated on top of paved surfaces and/or ground protection measures;
 - c. Any excavation is undertaken by:
 - i. Hand-digging, air spade, or hydro vac; or
 - ii. Drilling machine at a depth of 1m or greater;
 - d. The pruning of roots is limited to roots 35mm in diameter or less at the point of severance; and
 - e. The works do not create new impermeable surfaces (including sealing, paving, soil compaction), buildings or structures within

There are no matters of discretion for this standard.

- the root protection area; and
- f. The works will affect less than 10% of the protected root zone.
3. Removal of a tree must only be undertaken where:
- a. It is essential due to a serious imminent threat to the safety of people or property;
 - b. The tree is confirmed to be dead or in terminal decline by a technician arborist;
 - c. Porirua City Council is advised as soon as reasonably practicable prior to work commencing;
 - d. The works are undertaken or supervised by a technician arborist; and
 - e. Porirua City Council is provided with written documentation by a technician arborist confirming that the works were necessary and undertaken in accordance with good arboricultural practice no more than 10 working days after the works have been completed.

Point 51.63

Support / Support in part / Oppose

Support in part

Section: INF - Infrastructure

Sub-section: Policies

Provision

INF-Table 2	Street trees
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Submission

This is a continuation of the previous submission point re telecommunication lines being included in Table 2 - the Table would not copy in isovist under the submission point on INF-S23

Relief sought

INF-Table 2	Street trees
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Size class at maturity (stem diameter at 1.5m above ground)	<300mm	300-600mm	>600mm
Height at maturity	8	10	25
Minimum number of trees per 1000m² of road reserve	8	6	4
<ul style="list-style-type: none"> • Manholes, drainage catchments, surface openings for underground infrastructure 			

Horizontal setback distances from underground infrastructure (m)	<ul style="list-style-type: none"> • Trunk water mains • Stormwater pipes >300mm diameter • Sewer pipes >300mm diameter • Distribution gas pipelines • <u>Telecommunication</u>, Distribution or customer connection electricity lines 	0.50	1.5	3.0
	<ul style="list-style-type: none"> • Transmission gas pipelines • Transmission electricity lines 	4.0	4.0	4.0
	<ul style="list-style-type: none"> • Hard surfaces (footpaths etc) • Road curbs • Vehicle crossings • Masonry walls 	0.6	1.0	1.5
	<ul style="list-style-type: none"> • Pavers • Lightly loaded structures (bus shelters, garages etc) • Heavily loaded structures (houses etc) • Street lights 	0.7	1.5	3.0
Minimum berm width (m)		5.0	5.0	8.0
Minimum topsoil depth (m)		1.5	2.0	3.0
Minimum soil volume (m³)		0.5	0.6	0.6
		10.0	12.0	20.0

Point 51.64

Support / Support in part / Oppose

Support in part

Section: REE - Resilience, Efficiency and Energy

Sub-section: REE - Resilience, Efficiency and Energy

Provision

REE-O3 Resilience

Submission

This objective is supported, however it appears to be a strategic objective that is not immediately supported by chapter objectives, policies, rules and standards (other than natural hazards). Infrastructure resilience is an important planning consideration, as can have significant social, cultural, economic and environmental wellbeing effects if infrastructure networks are interrupted.

Relief sought

Ensure infrastructure resilience is provided for throughout the plan, so that it guides decision makers

Point 51.65

Support / Support in part / Oppose

Support in part

Section: SPZ - Special Purpose Zone (BRANZ)

Sub-section: Standards

Provision

SPZ-S1 Height

Submission

The permitted height is supported, however infringing the height can create reverse sensitivity effects on telecommunications through changing the efficacy of any nearby antennas, and also can create potential health and safety effects on the occupants of the building proposed to extend through the permitted height through radiofrequency exposure. As such, a matter of discretion should be effects on regionally significant network utility operators.

Relief sought

SPZ-S1 Height

1. All buildings and structures must not exceed a maximum height above ground level of 10m.

This standard does not apply to:

- Solar water heating components provided these do not exceed the height by more than 500mm;
- Chimney structures not exceeding 1.1m in width on any elevation and provided these do not exceed the height by more than 1m;
- Antennas, aerials, and flues provided these do not exceed the height by more than 1m; or
- Satellite dishes (less than 1m in diameter) and architectural features (e.g. finials, spires) provided these do not exceed the height by more than 1m.

Matters of discretion are restricted to:

1. Design and siting of the building or structure;
2. Any shading of, or loss of privacy for, residential units on adjacent sites;
3. Screening, planting, and landscaping of the building or structure;
4. Whether an increase in building or structure height results from a response to natural hazard mitigation; and
5. Whether topographical or other site constraints make compliance with the standard impractical.
6. Any reverse sensitivity effects on regionally significant infrastructure

Point 51.66

Support / Support in part / Oppose

Support in part

Section: SETZ - Settlement Zone

Sub-section: Standards

Provision

SETZ-S1 Height

Submission

The permitted height is supported, however infringing the height can create reverse sensitivity effects on telecommunications through changing the efficacy of any nearby antennas, and also can create potential health and safety effects on the occupants of the building proposed to extend through the permitted height through radiofrequency exposure. As such, a matter of discretion should be effects on regionally significant network utility operators.

Relief sought

SETZ-S1 Height

1. All buildings and structures must not exceed a maximum height above ground level of 8m.

Matters of discretion are restricted to:

1. Design and siting of the building or structure;
2. Any shading of, or loss of privacy for, residential units on

This standard does not apply to:

- Solar water heating components provided these do not exceed the height by more than 500mm;
- Chimney structures not exceeding 1.1m in width on any elevation and provided these do not exceed the height by more than 1m;
- Antennas, aerials, and flues provided these do not exceed the height by more than 1m; or
- Satellite dishes (less than 1m in diameter) and architectural features (e.g. finials, spires) provided these do not exceed the height by more than 1m.

- adjacent sites;
3. Screening, planting, and landscaping of the building or structure;
 4. Whether an increase in building or structure height results from a response to natural hazard mitigation; and
 5. Whether topographical or other site constraints make compliance with the standard impractical.
 6. Any reverse sensitivity effects on regionally significant infrastructure

Point 51.67

Support / Support in part / Oppose

Support in part

Section: GRZ - General Residential Zone

Sub-section: Standards

Provision

GRZ-S1 Height

Submission

The permitted height is supported, however infringing the height can create reverse sensitivity effects on telecommunications through changing the efficacy of any nearby antennas, and also can create potential health and safety effects on the occupants of the building proposed to extend through the permitted height through radiofrequency exposure. As such, a matter of discretion should be effects on regionally significant network utility operators.

Relief sought

GRZ-S1 Height

1. All buildings and structures must not exceed a maximum height above ground level of 8m, except:

- a. An additional 1m can be added to the maximum height of any building with a roof pitch of between 15° and 45°, which rises to a ridge that is centered or within the middle third of the building footprint, as illustrated in [GRZ-Figure 1](#) below.

This standard does not apply to:

- Solar water heating components provided these do not exceed the height by more than 500mm;
- Chimney structures not exceeding 1.1m in width on any elevation and provided these do not exceed the height by more than 1m;
- Antennas, aerials, and flues provided these do not exceed the height by more than 1m;
- Satellite dishes (less than 1m in diameter) and

Matters of discretion are restricted to:

1. The location, design and appearance of the building or structure;
2. Any adverse effects on the streetscape;
3. Visual dominance, shading and loss of privacy for adjacent residential sites;
4. Compatibility with the anticipated scale, proportion and context of buildings and activities in the surrounding area;
5. Retention of established landscaping;
6. Whether an increase in building or structure height results from a response to natural hazard mitigation; and
7. Whether topographical or other site constraints make compliance with the standard impractical.
8. Any reverse sensitivity effects on regionally significant infrastructure.

architectural features (e.g. finials, spires) provided these do not exceed the height by more than 1m; or

- Fences and standalone walls — see [GRZ-R4](#).

Point 51.68

Support / Support in part / Oppose

Support in part

Section: MRZ - Medium Density Residential Zone

Sub-section: Standards

Provision

MRZ-S1 Height

Submission

The permitted height is supported, however infringing the height can create reverse sensitivity effects on telecommunications through changing the efficacy of any nearby antennas, and also can create potential health and safety effects on the occupants of the building proposed to extend through the permitted height through radiofrequency exposure. As such, a matter of discretion should be effects on regionally significant network utility operators.

Relief sought

MRZ-S1 Height

1. All buildings and structures must not exceed a maximum height above ground level of:

- 11m; or
- 15m in the Eastern Porirua Residential Intensification Precinct.

Except that:

- An additional 1m can be added to the maximum height of any building with a roof pitch of between 15° and 45°, which rises to a ridge that is centred or within the middle third of the building footprint, as illustrated in [MRZ-Figure 1](#) below.

This standard does not apply to:

- Solar water heating components provided these do not exceed the height by more than 500mm;
- Chimney structures not exceeding 1.1m in width on any elevation and provided these do not exceed the height by more than 1m;
- Antennas, aerials, and flues provided these do not exceed the height by more than 1m; or
- Satellite dishes (less than 1m in diameter) and architectural features (e.g. finials, spires) provided these do not exceed the height by more than 1m.
- Lift overruns provided these do not exceed the height by more than 1m.

Matters of discretion are restricted to:

1. The location, design and appearance of the building or structure;
2. Any adverse effects on the streetscape;
3. Visual dominance, shading and loss of privacy for adjacent residential sites;
4. Compatibility with the anticipated scale, proportion and context of buildings and activities in the surrounding area;
5. Retention of established landscaping;
6. Whether an increase in building or structure height results from a response to natural hazard mitigation; and
7. Whether topographical or other site constraints make compliance with the standard impractical.
8. Any reverse sensitivity effects on regionally significant infrastructure

Point 51.69

Support / Support in part / Oppose

Support in part

Section: MUZ - Mixed Use Zone

Sub-section: Standards

Provision

MUZ-S1 Height

Submission

The permitted height is supported, however infringing the height can create reverse sensitivity effects on telecommunications through changing the efficacy of any nearby antennas, and also can create potential health and safety effects on the occupants of the building proposed to extend through the permitted height through radiofrequency exposure. As such, a matter of discretion should be effects on regionally significant network utility operators.

Relief sought

MUZ-S1 Height

1. All buildings and structures must not exceed a maximum height above ground level of 12m, except that:
- a. An additional 1m can be added to the maximum height of any building with a roof slope of 15° or greater; and
 - b. Any fence or standalone wall along a side or rear boundary which adjoins a site zoned General Residential Zone, Medium Density Residential Zone, Open Space Zone or Sport and Active Recreation Zone must not exceed 2m in height.

This standard does not apply to:

- Solar water heating components provided these do not exceed the height by more than 1m;
- Chimney structures not exceeding 1.1m in width on any elevation and provided these do not exceed the height by more than 1m;
- Antennas, aerials, and flues provided these do not exceed the height by more than 1m; or
- Satellite dishes (less than 1m in diameter) and architectural features (e.g. finials, spires) provided these do not exceed the height by more than 1m.
- Lift overruns provided these do not exceed the height by more than 1m.

Matters of discretion are restricted to:

1. The location, design and appearance of the building or structure;
2. Any adverse effects on the streetscape;
3. Visual dominance, shading and loss of privacy for adjoining Residential or Open Space and Recreation zoned sites;
4. Compatibility with the anticipated scale, proportion and context of buildings, structures and activities in the surrounding area;
5. Whether an increase in building height results from a response to natural hazard mitigation; and
6. Consistency with the Mixed Use Zone Design Guide.
7. Any reverse sensitivity effects on regionally significant infrastructure

Point 51.70

Support / Support in part / Oppose

Support in part

Section: GIZ - General Industrial Zone

Sub-section: Standards

Provision

GIZ-S1 Building height

Submission

The permitted height is supported, however infringing the height can create reverse sensitivity effects on telecommunications through changing the efficacy of any nearby antennas, and also can create potential health and safety effects on the occupants of the building proposed to extend through the permitted height through radiofrequency exposure. As such, a matter of discretion should be effects on regionally significant network utility operators.

Relief sought

GIZ-S1 Building height

1. All buildings and structures shall comply with a maximum height above ground level of 20m.

This standard does not apply to:

- Solar water heating components provided these do not exceed the height by more than 500mm;
- Chimney structures not exceeding 1.1m in width on any elevation and provided these do not exceed the height by more than 1m;
- Antennas, aerials, and flues provided these do not exceed the height by more than 1m; or
- Satellite dishes (less than 1m in diameter) and architectural features (e.g. finials, spires) provided these do not exceed the height by more than 1m.

Matters of discretion are restricted to:

1. The location, design and appearance of the building or structure;
2. Visual dominance, shading and loss of privacy for adjoining Residential or Open Space and Recreation zoned sites;
3. Bulk and dominance of the building or structure;
4. Compatibility with the anticipated scale, proportion and context of buildings and activities in the surrounding area;
5. Whether an increase in building height results from a response to natural hazard mitigation; and
6. Whether topographical or other site constraints make compliance with the standard impractical.
7. Any reverse sensitivity effects on regionally significant infrastructure

Point 51.71

Support / Support in part / Oppose

Support in part

Section: SARZ - Sport and Active Recreation Zone

Sub-section: Standards

Provision

SARZ-S1 Height

Submission

The permitted height is supported, however infringing the height can create reverse sensitivity effects on telecommunications through changing the efficacy of any nearby antennas, and also can create potential health and safety effects on the occupants of the building proposed to extend through the permitted height through radiofrequency exposure. As such, a matter of discretion should be effects on regionally significant network utility operators.

Relief sought

SARZ-S1 Height

1. All buildings and structures must not exceed a maximum height above ground level of 8m, except:

- a. Playground equipment must not exceed a height above ground level of 8m;
- b. A light pole must not exceed a maximum height above ground level of 18m; and
- c. Playground equipment must not exceed a maximum height above ground of 8m.

Matters of discretion are restricted to:

- 1. Design and siting of the building or structure;
- 2. Any shading of, or loss of privacy for, residential units on adjacent sites;
- 3. Screening, planting, and landscaping of the building or structure;
- 4. Whether an increase in building or structure height results from a response to natural hazard mitigation; and
- 5. Whether topographical or other site constraints make compliance with the standard impractical.
- 6. Any reverse sensitivity effects on regionally significant infrastructure

Point 51.72

Support / Support in part / Oppose

Support in part

Section: GRUZ - General Rural Zone

Sub-section: Standards

Provision

GRUZ-S1 Height

Submission

The permitted height is supported, however infringing the height can create reverse sensitivity effects on telecommunications through changing the efficacy of any nearby antennas, and also can create potential health and safety effects on the occupants of the building proposed to extend through the permitted height through radiofrequency exposure. As such, a matter of discretion should be effects on regionally significant network utility operators.

Relief sought

GRUZ-S1 Height

1. All buildings and structures must not exceed a maximum height above ground level of 10m.

This standard does not apply to:

- Solar water heating components provided these do not exceed the height by more than 500mm;
- Chimney structures not exceeding 1.1m in width on any elevation and provided these do not exceed the height by more than 1m;
- Antennas, aerials, and flues provided these do not exceed the height by more than 1m; or
- Satellite dishes (less than 1m in diameter) and architectural features (e.g. finials, spires) provided these do not exceed the height by more than 1m.

Matters of discretion are restricted to:

- 1. Design and siting of the building or structure;
- 2. Any shading of, or loss of privacy for, residential units on adjacent sites;
- 3. Screening, planting, and landscaping of the building or structure;
- 4. Whether an increase in building or structure height results from a response to natural hazard mitigation; and
- 5. Whether topographical or other site constraints make compliance with the standard impractical.
- 6. Any reverse sensitivity effects on regionally significant infrastructure

Point 51.73

Support / Support in part / Oppose

Support in part

Section: RLZ - Rural Lifestyle Zone

Sub-section: Standards

Provision

RLZ-S1 Height

Submission

The permitted height is supported, however infringing the height can create reverse sensitivity effects on telecommunications through changing the efficacy of any nearby antennas, and also can create potential health and safety effects on the occupants of the building proposed to extend through the permitted height through radiofrequency exposure. As such, a matter of discretion should be effects on regionally significant network utility operators.

Relief sought

RLZ-S1 Height

1. All buildings and structures must not exceed a maximum height above ground level of 10m.

This standard does not apply to:

- Solar water heating components provided these do not exceed the height by more than 500mm;
- Chimney structures not exceeding 1.1m in width on any elevation and provided these do not exceed the height by more than 1m;
- Antennas, aerials, and flues provided these do not exceed the height by more than 1m; or
- Satellite dishes (less than 1m in diameter) and architectural features (e.g. finials, spires) provided these do not exceed the height by more than 1m.

Matters of discretion are restricted to:

1. Design and siting of the building or structure;
2. Any shading of, or loss of privacy for, residential units on adjacent sites;
3. Screening, planting, and landscaping of the building or structure;
4. Whether an increase in building or structure height results from a response to natural hazard mitigation; and
5. Whether topographical or other site constraints make compliance with the standard impractical.
6. Any reverse sensitivity effects on regionally significant infrastructure

Point 51.74

Support / Support in part / Oppose

Support in part

Section: OSZ - Open Space Zone

Sub-section: Standards

Provision

OSZ-S1 Height

Submission

The permitted height is supported, however infringing the height can create reverse sensitivity effects on telecommunications through changing the efficacy of any nearby antennas, and also can create potential health and safety effects on the occupants of the building proposed to extend through the permitted height through radiofrequency exposure. As such, a matter of discretion should be effects on regionally significant network utility operators.

Relief sought

OSZ-S1 Height

1. All buildings and structures must not exceed a maximum height above ground level of 5m, except:

- a. Any building or structure within Battle Hill Farm Forest Park or Belmont Regional Park must not exceed a maximum height above ground level of 8m;
- b. A light pole must not exceed a maximum height above ground level of 18m; and
- c. Playground equipment must not exceed a maximum height above ground of 8m.

Matters of discretion are restricted to:

- 1. Design and siting of the building or structure;
- 2. Any shading of, or loss of privacy for, residential units on adjacent sites;
- 3. Screening, planting, and landscaping of the building or structure;
- 4. Whether an increase in building or structure height results from a response to natural hazard mitigation; and
- 5. Whether topographical or other site constraints make compliance with the standard impractical.
- 6. Any reverse sensitivity effects on regionally significant infrastructure

Point 51.75

Support / Support in part / Oppose

Support in part

Section: NCZ - Neighbourhood Centre Zone

Sub-section: Standards

Provision

NCZ-S1 Height

Submission

The permitted height is supported, however infringing the height can create reverse sensitivity effects on telecommunications through changing the efficacy of any nearby antennas, and also can create potential health and safety effects on the occupants of the building proposed to extend through the permitted height through radiofrequency exposure. As such, a matter of discretion should be effects on regionally significant network utility operators.

Relief sought

NCZ-S1 Height

1. All buildings and structures must not exceed a maximum height above ground level of 11m, except that:

- a. An additional 1m can be added to the maximum height of any building with a roof slope of 15° or greater; and
- b. Any fence or standalone wall along a side or rear boundary which adjoins a site zoned General Residential Zone, Medium Density Residential Zone, Open Space Zone or Sport and Active Recreation Zone must not exceed 2m in height.

This standard does not apply to:

Matters of discretion are restricted to:

- 1. The location, design and appearance of the building or structure;
- 2. Any adverse effects on the streetscape;
- 3. Visual dominance, shading and loss of privacy for adjoining Residential or Open Space and Recreation zoned sites;
- 4. Compatibility with the anticipated scale, proportion and context of buildings, structures and activities in the surrounding area; and
- 5. Whether an increase in building height results from a

- Solar water heating components provided these do not exceed the height by more than 1m.
- Chimney structures not exceeding 1.1m in width on any elevation and provided these do not exceed the height by more than 1m.
- Antennas, aerials, and flues provided these do not exceed the height by more than 1m.
- Satellite dishes (less than 1m in diameter) and architectural features (e.g. finials, spires) provided these do not exceed the height by more than 1m.
- Lift overruns provided these do not exceed the height by more than 1m.

- response to natural hazard mitigation.
6. Any reverse sensitivity effects on regionally significant infrastructure

Point 51.76

Support / Support in part / Oppose

Support in part

Section: LCZ - Local Centre Zone

Sub-section: Standards

Provision

LCZ-S1 Height

Submission

The permitted height is supported, however infringing the height can create reverse sensitivity effects on telecommunications through changing the efficacy of any nearby antennas, and also can create potential health and safety effects on the occupants of the building proposed to extend through the permitted height through radiofrequency exposure. As such, a matter of discretion should be effects on regionally significant network utility operators.

Relief sought

LCZ-S1 Height

1. All buildings and structures must not exceed a maximum height above ground level of 12m, except that:

- a. An additional 1m can be added to the maximum height of any building with a roof slope of 15° or greater; and
- b. Any fence or standalone wall along a side or rear boundary which adjoins a site zoned General Residential, Medium Density Residential, Open Space or Sport and Active Recreation must not exceed 2m in height.

This standard does not apply to:

- Solar water heating components provided these do not exceed the height by more than 1m;
- Chimney structures not exceeding 1.1m in width on any elevation and provided these do not exceed the height by more than 1m;
- Antennas, aerials, and flues provided these do not exceed the height by more than 1m; or

Matters of discretion are restricted to:

1. The location, design and appearance of the building or structure;
2. Any adverse effects on the streetscape;
3. Visual dominance, shading and loss of privacy for adjoining Residential or Open Space and Recreation zoned sites;
4. Compatibility with the anticipated scale, proportion and context of buildings, structures and activities in the surrounding area;
5. Whether an increase in building height results from a response to natural hazard mitigation; and
6. Consistency with the Local Centre Zone Design Guide.
7. Any reverse sensitivity effects on regionally significant infrastructure

- Satellite dishes (less than 1m in diameter) and architectural features (e.g. finials, spires) provided these do not exceed the height by more than 1m.
- Lift overruns provided these do not exceed the height by more than 1m.

Point 51.77

Support / Support in part / Oppose

Support in part

Section: FUZ - Future Urban Zone

Sub-section: Standards

Provision

FUZ-S1 Height

Submission

The permitted height is supported, however infringing the height can create reverse sensitivity effects on telecommunications through changing the efficacy of any nearby antennas, and also can create potential health and safety effects on the occupants of the building proposed to extend through the permitted height through radiofrequency exposure. As such, a matter of discretion should be effects on regionally significant network utility operators.

Relief sought

FUZ-S1 Height

1. All buildings and structures must not exceed a maximum height above ground level of 10m.

This standard does not apply to:

- Solar water heating components provided these do not exceed the height by more than 500mm;
- Chimney structures not exceeding 1.1m in width on any elevation and provided these do not exceed the height by more than 1m;
- Antennas, aerials, and flues provided these do not exceed the height by more than 1m; or
- Satellite dishes (less than 1m in diameter) and architectural features (e.g. finials, spires) provided these do not exceed the height by more than 1m.

Matters of discretion are restricted to:

1. Design and siting of the building or structure;
2. Any shading of, or loss of privacy for, residential units on adjacent sites;
3. Screening, planting, and landscaping of the building or structure;
4. Whether an increase in building or structure height results from a response to natural hazard mitigation; and
5. Whether topographical or other site constraints make compliance with the standard impractical.
6. Any reverse sensitivity effects on regionally significant infrastructure

Point 51.78

Support / Support in part / Oppose

Support in part

Section: HOSZ - Hospital Zone

Sub-section: Standards

Provision

HOSZ-S1 Height

Submission

The permitted height is supported, however infringing the height can create reverse sensitivity effects on telecommunications through changing the efficacy of any nearby antennas, and also can create potential health and safety effects on the occupants of the building proposed to extend through the permitted height through radiofrequency exposure. As such, a matter of discretion should be effects on regionally significant network utility operators.

Relief sought

HOSZ-S1 Height

1. All buildings and structures must not exceed a maximum height above ground level of 11m.

This standard does not apply to:

- Solar water heating components provided these do not exceed the height by more than 500mm;
- Chimney structures not exceeding 1.1m in width on any elevation and provided these do not exceed the height by more than 1m;
- Antennas, aerials, and flues provided these do not exceed the height by more than 1m; or
- Satellite dishes (less than 1m in diameter) and architectural features (e.g. finials, spires) provided these do not exceed the height by more than 1m.

Matters of discretion are restricted to:

1. Design and siting of the building or structure;
2. Any adverse effects on the streetscape;
3. Any adverse effects on the amenity of adjoining residential sites including shading effects;
4. Compatibility with the anticipated scale, proportion and context of buildings and activities on surrounding sites; and
5. The extent to which the infringement is necessary due to the shape or natural and physical features of the site.
6. Any reverse sensitivity effects on regionally significant infrastructure

Point 51.79

Support / Support in part / Oppose

Support in part

Section: MPZ - Maori Purpose Zone (Hongoeaka)

Sub-section: Standards

Provision

MPZ-S1 Height

1. All buildings and structures must comply with a maximum height above ground level of 8m, except that:

- a. An additional 1m can be added to the maximum height of any building with a roof pitch of between 15° and 45°, which rises to a ridge that is centered or within the middle third of the building footprint, as illustrated in MPZ-Figure 1 below.

This standard does not apply to:

- Solar water heating components provided these do not exceed the height by more than 500mm;
- Chimney structures not exceeding 1.1m in width on any elevation and provided these do not exceed the height by

Matters of discretion are restricted to:

1. Design and siting of the building or structure;
2. Any shading of, or loss of privacy for, residential units on adjacent sites;
3. Screening, planting, and landscaping of the building or structure;
4. Whether an increase in building or structure height results from a response to natural hazard mitigation; and
5. Whether topographical or other site constraints make compliance with the standard impractical.

more than 1m;

- Antennas, aerials, and flues provided these do not exceed the height by more than 1m; or
- Satellite dishes (less than 1m in diameter) and architectural features (e.g. finials, spires) provided these do not exceed the height by more than 1m.

Submission

The permitted height is supported, however infringing the height can create reverse sensitivity effects on telecommunications through changing the efficacy of any nearby antennas, and also can create potential health and safety effects on the occupants of the building proposed to extend through the permitted height through radiofrequency exposure. As such, a matter of discretion should be effects on regionally significant network utility operators.

Relief sought

MPZ-S1 Height

1. All buildings and structures must comply with a maximum height above ground level of 8m, except that:

- a. An additional 1m can be added to the maximum height of any building with a roof pitch of between 15° and 45°, which rises to a ridge that is centered or within the middle third of the building footprint, as illustrated in [MPZ-Figure 1](#) below.

This standard does not apply to:

- Solar water heating components provided these do not exceed the height by more than 500mm;
- Chimney structures not exceeding 1.1m in width on any elevation and provided these do not exceed the height by more than 1m;
- Antennas, aerials, and flues provided these do not exceed the height by more than 1m; or
- Satellite dishes (less than 1m in diameter) and architectural features (e.g. finials, spires) provided these do not exceed the height by more than 1m.

Matters of discretion are restricted to:

1. Design and siting of the building or structure;
2. Any shading of, or loss of privacy for, residential units on adjacent sites;
3. Screening, planting, and landscaping of the building or structure;
4. Whether an increase in building or structure height results from a response to natural hazard mitigation; and
5. Whether topographical or other site constraints make compliance with the standard impractical.
6. Any reverse sensitivity effects on regionally significant infrastructure

**Correspondence between
Council and submitter which
forms part of this submission**

Louise White

From: Tom Anderson <Tom@incite.co.nz>
Sent: Monday, 1 February 2021 12:43 PM
To: Rory Smeaton
Subject: [EXTERNAL] RE: Proposed Porirua District Plan - submission clarification

Hey Rory
Happy new year – yeah that approach sounds perfect for those situations thanks!
When will the summary of subs be notified?
On another note, are you or anyone else off from PCC to NZPI conference this year?

Tom Anderson
Director/Principal Planner

Level 2, 11 Tory Street
PO Box 2058, Wellington
Tel 04 801 6862
Mob 027 231 0246
tom@incite.co.nz
www.incite.co.nz

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From: Rory Smeaton <Rory.Smeaton@porirua.govt.nz>
Sent: Monday, 1 February 2021 12:02 PM
To: Tom Anderson <Tom@incite.co.nz>
Subject: Proposed Porirua District Plan - submission clarification

Hi Tom,

Thanks for the submission on the Proposed Porirua District Plan on behalf of Spark, Vodafone and Chorus, and for submitting it directly through Isovist.

I have gone through and pulled the submission points through into the submission summary part of Isovist, and just had one thing I wanted to clarify: In a few cases you have stated support for certain provisions, but then put 'N/A' for the relief sought. Should the relief sought for these provisions be 'Retain as notified' for the summary of decisions requested?

Thanks in advance.

Cheers,

Rory

Rory Smeaton MNZPI
Senior Policy Planner
Kaihanga Mahere Kaupapahere Matua