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	Name	Tom Anderson
	Organisation	Incite
	Email	tom@incite.co.nz
	Response Date	Aug 30 22 04:13:28 pm
	Notes	Tom Anderson
Q1	Select the chapter you want to provide feedback on	
	Part 1 - Introduction and General Provisions	
Q2	In general, to what extent do you support the contents of this chapter?	
	Neutral	
Q3	Objective/Policy/Rule/Standard reference:	
	See attachment	
Q4	Feedback/Comments	
	This feedback is on behalf of Chorus, Spark, and Vodafone. It covers the entire plan. The specific feedback is included in the attachment	
Q5	Objective/Policy/Rule/Standard reference:	
Q6	Feedback/Comments	
Q7	Objective/Policy/Rule/Standard reference:	
Q8	Feedback/Comments	
Q9	Objective/Policy/Rule/Standard reference:	
Q10	Feedback/Comments	
Q11	supporting documents?	
	0	
Q12	If you need more space, or have any other general comments, please leave them here	

30 August 2022

Waitaki District Council
Private Bag 50058
Oamaru 9444

By Email: planreview@waitaki.govt.nz

Dear Sir/Madam

Feedback on the Draft Waitaki District Plan

This feedback on the Draft Waitaki District Plan (DDP) is on behalf of Chorus New Zealand Limited (Chorus), Spark New Zealand Trading Limited (Spark) and Vodafone New Zealand Limited (Vodafone), who are 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. They appreciate the continued opportunity to engage and submit on the DDP.

When preparing a District Plan the most important stage in our opinion is the engagement, collaboration with mana whenua, stakeholders and the community to explore what is important and need to create a key regulatory platform for the Waitaki District to rely on the next 10 to 15 years.

It is the strong view of Incite, who act for Chorus, Spark and Vodafone nationally, 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 to no variation across New Zealand. As national telecommunication network operators, Chorus, Spark and Vodafone depend on reasonable consistency of provisions to enable New Zealanders to access the digital world required 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 increased costs, delays and uncertainty for the telecommunications industry that is constantly upgrading or rolling new technology, such as the rollout of 5G (fifth generation) mobile telecommunications network.

Many of the changes suggested through this feedback provide for national consistency, attempting to do so in a way which allows for appropriate effects on the environment, whether it be through permitted, restricted discretionary or another activity status.

We would happily discuss the changes sought, either via videoconference or a workshop, and we would be happy to collaborate with other infrastructure providers for this as well.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Tom Anderson', with a stylized flourish at the end.

Tom Anderson

Director/Principal Planner

Incite

tom@incite.co.nz

04 801 6862 or 027 231 0246

CC.

Andrew Kantor - Andrew.Kantor@chorus.co.nz

Planning and Engagement Manager, Chorus

Graeme McCarrison – Graeme.McCarrison@spark.co.nz

Engagement & Planning Manager, Spark

Colin Clune – Colin.Clune@vodafone.com

RMA Planner, Networks & Platforms - Radio Access, Vodafone

Feedback on Waitaki Draft District Plan August 2022

PROVISION	FEEDBACK
PART 1 – INTRODUCTION AND GENERAL PROVISIONS	
<i>DEFINITIONS</i>	
Antenna	Support
Cabinet	Support
<i>Critical Facilities</i> <i>means facilities necessary to provide services which, if interrupted, would have a serious effect on the communities within the District or a wider population, and which would require immediate reinstatement. This includes any buildings and structures that support, protect or form part of critical facilities. Critical facilities include:</i> <i>7. telecommunications installations and networks</i>	Support with amendment Recognising telecommunications as critical infrastructure is supported. Radiocommunications should also be included as this network can also have a serious effect on communities within the region or a wider population, particularly after a critical incident, and would also require immediate reinstatement
Customer Connection Line	Support
Earthworks	Support
Essential Structures	Support
<i>Height</i> <i>means the vertical distance between a specified reference point and the highest part of any feature, structure or building above that point.</i>	Support with amendment Small infrastructure attached to the top of a structure, such as the following, should be excluded from the definition of height, as they do not create bulk and dominance effects: <ul style="list-style-type: none"> • ancillary utility equipment; • omni directional ‘whip’ antennas; • GPS antennas; • earth peaks; and • lightning rods.
Infrastructure	Support
Line	Support
Maintenance and Repair	Support
Network Utility	Support
Network Utility Operator	Support
Operational Need	Support
Pole	Support
Radiocommunication	Support
<i>Regionally Significant Infrastructure</i> <i>Regionally significant infrastructure is:</i> <i>2. Telecommunication facilities</i>	Support with amendment Recognising telecommunications as regionally significant infrastructure is supported. However in order to provide consistency with the definitions of Critical Infrastructure and Essential Structures, the wording under point 2 should read <i>telecommunication facilities networks</i> . Radiocommunications should also be included as this network can also have a serious effect on communities within the region or a wider population, particularly after a critical incident, and would also require immediate reinstatement. A discussion to understand the reasoning as to why there is Critical Infrastructure, Essential Structures and Regionally Significant Infrastructure would be useful.
Reverse Sensitivity	Support
Self-Contained Power Unit	Support
[New definition – Small Cell Unit]	Add a definition for Small Cell Unit as follows: <i>Small Cell Unit</i> <i>has the same meaning as in Regulation 4 of the NESTF as set out below:</i> <i>means a device—</i> <i>that receives or transmits radiocommunication or telecommunication signals; and</i> <i>the volume of which (including any ancillary equipment, but not including any cabling) is not more than 0.11 m³.</i>
<i>Telecommunication</i> has the same meaning as given in section 5 of the Telecommunications Act 2001	Support

PROVISION	FEEDBACK
[New definition – Telecommunication Kiosk]	Add a definition for Telecommunication Kiosk as follows: <i>Telecommunication Kiosk means any structure intended for public use to facilitate telecommunication and includes boxes or booths for telephone, video or internet services.</i>
<i>Temporary Activity means activities and their ancillary buildings and structures that are intended to have a limited duration and incidence and are not part of a permanent activity that occurs on the site.</i> <i>They include:</i> <i>1. fairs; festivals and special events;</i> <i>2. commercial filming or video production activities;</i> <i>3. public firework displays and lighting shows;</i> <i>4. buildings and structures ancillary to construction projects;</i> <i>5. temporary farmers or crafts markets; and</i> <i>6. temporary helicopter take-offs and landings.</i>	Support with amendment Include in the list <i>network utility structures which provide for ongoing or supplementary network operations</i>
<i>Transport Network Support Infrastructure means infrastructure located within the road reserve or railway corridor that supports the transport network and includes:</i> <i>1. traffic control signals and devices;</i> <i>2. light poles;</i> <i>3. bus stops and shelters;</i> <i>4. cycle parking;</i> <i>5. train stations;</i> <i>6. telecommunication kiosks;</i> <i>7. public toilets; and</i> <i>8. road or rail furniture.</i>	Support with amendment The definition is useful, however certain structures include do not necessarily support the transport network, they are more ancillary to it, such as telecommunication kiosks and public toilets. Perhaps the wording should be changed from <i>Support</i> to <i>Ancillary</i> ?
<i>Upgrading</i>	Support
ABBREVIATIONS	
<i>NESTF - National Environmental Standards for Telecommunications Facilities 2016</i>	Support with amendment In order to make consistent with other National Environmental Standard abbreviations, such as NESCS, the full NESTF name should be recorded in this list, being the <i>Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016</i>
NATIONAL DIRECTION INSTRUMENTS	
<i>National Environmental Standards (NES) are prepared by Central Government and can prescribe technical standards, methods (including rules) and/or other requirements for environmental matters throughout the whole country or specific areas. If an activity does not comply with an NES, it is likely to require a resource consent. NES must be observed and enforced by local authorities. The following NES are currently in effect:</i> <ul style="list-style-type: none"><i>National Environmental Standards for Telecommunication Facilities (2016)</i>	Support
REGULATIONS	
<i>The regulations in this chapter come under the Resource Management Act 1991, excluding the National Environmental Standards listed above. These regulations are as follows:</i> <ul style="list-style-type: none"><i>Resource Management (Network Utility Operations) Regulations 2016</i>	Support
PART 2: DISTRICT WIDE MATTERS	
STRATEGIC DIRECTION	
<i>SD-NE-O1 Natural character, landscapes and features and ecosystems</i> <i>Protection of the natural character, landscapes, features and ecosystems which strongly contribute to Waitaki's unique character, identity, and indigenous biodiversity.</i>	Support with amendment There are instances where the only location available for infrastructure is in an area which is subject to a natural character, landscape, features or ecosystems overlay. This should be recognised in the strategic direction for these areas.

PROVISION	FEEDBACK
	Suggested amendment is <i>Protection of the natural character, landscapes, features and ecosystems which strongly contribute to Waitaki's unique character, identity, and indigenous biodiversity, while recognising the need for infrastructure to sometimes be located in such areas.</i>
<p><i>SD-RREE-O1 Natural Hazards</i> <i>Improve the District's resilience to natural hazards, including where these will be exacerbated by climate change and where possible, avoid or mitigate the risks of natural hazards to people, communities, property, and infrastructure.</i></p>	Support – it is important that new development is assessed in regard to natural hazards. Putting infrastructure in natural hazard areas significantly increases the risk and control of installation and on-going operational costs for infrastructure. If development is going in hazards areas the costs should be met by the developer or Council
<p><i>SD-UFD-O1 Integrated Management</i> <i>Urban form comprises of good quality design and integration with infrastructure.</i></p>	Support – although it should be noted that non-urban development should be integrated with infrastructure as well.
<p><i>SD-UFD-O2 Housing Choice and Intensification</i> <i>A variety of housing types, sizes, and tenures are available across the District including:</i> <i>1. housing that meets the community's diverse social and economic housing needs; and</i> <i>2. provision for higher density housing in locations:</i> <i>a) where there is access to the transport network, multi-modal transport options; and</i> <i>b) within or near the Town Centre or a Local Centre where there is access to commercial services, community activities and public open space.</i></p>	Support with amendment. Higher density housing, as well as being in areas where there is access to transport options, also need to be integrated with other infrastructure.
<p><i>SD-UFD-O6 Urban Growth</i> <i>Future urban growth is appropriately located and serviced with relevant infrastructure.</i></p>	Support
<p><i>New District Wide Strategic Objective</i></p>	Add a new strategic objective that recognises the importance of Regionally Significant Infrastructure across the District, as follows: <i>The development, upgrade, maintenance and operation of all regionally significant infrastructure is enabled in a way that minimises adverse effects, while having regard to the practical constraints and the logistical and technical practicalities associated with regionally significant infrastructure.</i>
INFRASTRUCTURE	
<p><i>Introduction</i> <i>Network utility operators provide the infrastructure services which enable a community to undertake its everyday activities and functions. Infrastructure is critical to the social and economic well-being of people and communities, including providing for their health and safety. It generally encompasses physical services and facilities which enable society to function, such as the Three Waters network, transport, communications, energy generation and distribution networks, and any other network utilities.</i> <i>While infrastructure can have national, regional and local benefits, it can also have adverse effects on surrounding land uses and the environment. The sustainable management of natural and physical resources requires a balance between the effects of different land uses. However, it is also necessary that essential infrastructure is protected, where possible, from further encroachment by incompatible activities which may be subject to reverse sensitivity. Some infrastructure has specific operational and functional requirements that need to be accommodated for their operation. Due to the similarities of meteorological and hazard warning devices to infrastructure, these are also managed through this chapter.</i></p>	<p>Support with amendment The introduction makes it clear that infrastructure has national and regional as well as local benefits, that the chapter includes the management of infrastructure in overlays (and therefore the overlay chapters do not have to be read in conjunction with these provisions), and likewise it appears that the rules in the infrastructure chapter supersede the zones. The following amendments are requested for clarity:</p> <p><i>This chapter also manages infrastructure within overlays. Overlays spatially identify distinctive values, risks or other factors within the District which require management in a different manner from underlying zone provisions. The relevant overlays are identified in Schedules 2 - 8 of the Plan. As such, this chapter provides all objectives, policies, rules and standards for infrastructure within overlays, and the overlay or zone based chapters do not have to be considered for such activities.</i></p> <p><i>Note: Unless specifically stated otherwise, only the objectives and policies in the Strategic Direction Chapter, Energy Chapter, Part B: Waitaki Power Scheme and this Infrastructure Chapter apply to infrastructure activities. The rules in this Infrastructure</i></p>

PROVISION	FEEDBACK
<p><i>This chapter also manages infrastructure within overlays. Overlays spatially identify distinctive values, risks or other factors within the District which require management in a different manner from underlying zone provisions. The relevant overlays are identified in Schedules 2 - 8 of the Plan. Infrastructure includes facilities for the generation of electricity. This would include renewable electricity generation facilities, where these facilities supply power to other people (i.e. community or large-scale activities). However, these activities are addressed separately under the Energy Chapter.</i></p> <p><i>Given the importance of the Waitaki Power Scheme locally, regionally, and nationally, this is addressed in the Energy Chapter – Part B: Waitaki Power Scheme.</i></p> <p><i>Note: Unless specifically stated otherwise, only the objectives and policies in the Strategic Direction Chapter, Energy Chapter, Part B: Waitaki Power Scheme and this Infrastructure Chapter apply to infrastructure activities.</i></p>	<p><u>Chapter are the only rules relevant to infrastructure activities, regardless of zones and overlays.</u></p>
<p><i>INF-01 Effective, resilient, effective and safe infrastructure</i></p>	<p>Support</p>
<p><i>INF-02 Availability of infrastructure to meet existing and planned needs</i></p>	<p>Support</p>
<p><i>INF-03 Providing for infrastructure</i></p> <p><i>Infrastructure provides benefits to people and communities and is established, operated, maintained and repaired, upgraded efficiently, securely and sustainably while the adverse effects of infrastructure are avoided, remedied or mitigated, including:</i></p> <ol style="list-style-type: none"> <i>1. the defined amenity values and character of any zone; and</i> <i>2. the identified values and qualities of any overlay; and</i> <i>3. the change in risk to peoples' lives, and damage to neighbouring properties from natural hazards.</i> 	<p>Support with amendment.</p> <p>Requiring infrastructure to avoid, remedy or mitigate effects defined amenity values and character of any zone can be difficult to achieve – a pole for instance could be subjectively determined not to form part of the amenity or character of a residential zone, despite its operation being necessary for that zone to function. Rather than requiring infrastructure to avoid, remedy or mitigate effects on amenity and character, the objective should be for infrastructure to be compatible with the defined amenity values and character of any zone.</p> <p>Suggested alternative wording is as follows:</p> <p><i>Infrastructure provides benefits to people and communities and is established, operated, maintained and repaired, upgraded efficiently, securely and sustainably while the adverse effects of infrastructure are avoided, remedied or mitigated, including:</i></p> <ol style="list-style-type: none"> <i>1. the defined amenity values and character of any zone; and</i> <i>2. the identified values and qualities of any overlay; and</i> <i>3. the change in risk to peoples' lives, and damage to neighbouring properties from natural hazards.</i> <p><u>Infrastructure should also be compatible with the defined amenity values and character of any zone.</u></p>
<p><i>INF-04 The protection of regionally significant infrastructure</i></p>	<p>Support</p>
<p><i>INF-P1 Recognising the benefits of regionally significant infrastructure</i></p>	<p>Support</p>
<p><i>INF-P2 The benefits of infrastructure other than regionally significant infrastructure</i></p>	<p>Support</p>
<p><i>INF-P3 Infrastructure is safe, efficient and meets the needs of planned future growth</i></p>	<p>Support</p>
<p><i>INF-P4 Appropriate infrastructure</i></p> <p><i>Enable new infrastructure and the operation, maintenance, repair, upgrading and removal of existing infrastructure, where:</i></p> <ol style="list-style-type: none"> <i>1. it is of a form, location and scale that minimises adverse effects on the environment; and</i> <i>2. it is consistent with the anticipated amenity and character of the zone in which the infrastructure is located; and</i> <i>3. for any maintenance and repair, or removal of existing infrastructure in any overlay, does not adversely impact on the identified values and characteristics of any overlay that it is located within.</i> 	<p>Support with amendment.</p> <p>Unlike INF-03, INF-P4 requires infrastructure to be <i>consistent with</i> the anticipated amenity and character of the zone in which the infrastructure is located. For consistency, it would be preferred if the words <i>consistent with</i> in INF-P4-2 are replaced with <u>compatible with.</u></p>

PROVISION	FEEDBACK
<p><i>INF-P5 Adverse effects on regionally significant infrastructure</i> <i>Protect the safe and efficient operation, maintenance, repair, upgrading, removal and development of regionally significant infrastructure from being unreasonably compromised by:</i></p> <ol style="list-style-type: none"> <i>1. avoiding sensitive activities and building platforms located within the National Grid Yard;</i> <i>2. restricting sensitive activities and building platforms located within the Electricity Distribution Yard;</i> <i>3. only allowing subdivision within the National Grid Subdivision Corridor and Electricity Distribution Corridor where it can be demonstrated that any adverse effects on and from the National Grid and/or Electricity Distribution Network, including public health and safety, will be avoided, remedied or mitigated, taking into account:</i> <ol style="list-style-type: none"> <i>a) the impact of subdivision layout and design on the operation and maintenance, and potential upgrade and development of the National Grid or Electricity Distribution Network;</i> <i>b) the ability of any potential future development to comply with NZECP 34:2001 New Zealand Electrical Code of Practice for Electrical Safe Distances;</i> <i>c) 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 or Electricity Distribution Yard for each new lot;</i> <i>d) the risk to the structural integrity of the National Grid or Electricity Distribution Network;</i> <i>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 or Electricity Distribution Network and the potential reverse sensitivity on and amenity and nuisance effects of the National Grid or Electricity Distribution Network assets;</i> <i>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;</i> <i>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 Electricity Distribution Network;</i> <i>6. considering any potential adverse effects of subdivision of a site that contains or is adjacent to any regionally significant infrastructure not addressed by INF-P5-2; and</i> <i>7. requiring subdivision of a site that contains or is adjacent to any regionally significant infrastructure not addressed by INF-P5-2 to be designed to avoid or mitigate any adverse effects on access to, and the safe and efficient operation, repair and maintenance of, that infrastructure.</i> 	<p>Support with amendment.</p> <p>The policy is very national grid focussed. While this is important to maintain consistency of the Plan with higher order documents, the policy could be rebalanced, with matter number 1 being a variant of current matter number 6, i.e. being holistic and capturing all Regionally Significant Infrastructure, following by matter number 7, then the more infrastructure specific requirements forming the subsequent matters in the policy from new matter 3 onwards. Alternative is to split the policy into two parts – all Regionally Significant Infrastructure, and then National Grid infrastructures.</p>
<p><i>INF-P8 Providing for other infrastructure not defined as regionally significant infrastructure outside of overlays.</i></p>	<p>Support</p>
<p><i>INF-P9 Recognise operational needs and functional needs of infrastructure</i> <i>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 operation, maintenance and upgrading of existing infrastructure:</i></p> <ol style="list-style-type: none"> <i>1. the extent to which:</i> <ol style="list-style-type: none"> <i>a) the potential for significant adverse effects have been addressed through site, route or method selection; and</i> 	<p>Support with amendment.</p> <p>Remove point 6 as there is infrastructure that supports rural land use as well as urban development.</p>

PROVISION	FEEDBACK
<p>b) the ability to avoid, remedy or mitigate adverse effects of infrastructure is constrained by functional and operational needs; and</p> <p>2. the time, duration or frequency of adverse effects; and</p> <p>3. the necessity of the infrastructure including:</p> <p>a) the need to quickly repair and restore disrupted services; and</p> <p>b) the impact of not operating, repairing, maintaining, upgrading, removing or developing infrastructure; and</p> <p>4. the location and operational and functional needs of existing infrastructure including:</p> <p>a) the complexity and connectedness of networks and services; and</p> <p>b) the potential for co-location and shared use of infrastructure corridors; and</p> <p>5. anticipated outcomes for the receiving environment and the role, function, character and amenity values of the zone in which it is located; and</p> <p>6. the extent to which the infrastructure is integrated with, and necessary to support, planned urban development.</p>	
INF-P10 New technology	Support
INF-P11 Electric and magnetic fields and radiofrequency fields	Support
INF-P16 Upgrades to existing and new infrastructure on Heritage Items or within their heritage settings, or Sites and Areas of Significance to Māori identified in SCHED2 – Historic Heritage Items and SCHED5 – Sites and Areas of Significance to Māori or the Ōamaru Historic Area	Support
INF-P17 Trimming, pruning and activities within the root protection area of trees in SCHED4 – Notable Trees	Support
INF-P18 Removal of trees in SCHED4 – Notable Trees	Support
INF-P19 Upgrades to existing and new infrastructure in the Coastal Environment	Support
INF-P20 Upgrades to existing, and new infrastructure on or within Outstanding Natural Features and Landscapes, and Significant Natural Areas, beyond the Coastal Environment	Support
INF-P21 Upgrades to existing and new infrastructure within the Rural Scenic Landscape Overlay or a Significant Natural Feature	Support
<p>INF-P22 Infrastructure in natural hazard overlay and coastal natural hazard overlay</p> <p>Only allow for upgraded and new infrastructure in the natural hazard overlay and coastal natural hazard overlay where the infrastructure:</p> <p>1. does not increase the risk from the natural hazard, to people, other property or infrastructure; and</p> <p>2. does not increase the risk of environmental harm; and</p> <p>3. has a functional need or operational need that means the infrastructure's location cannot be avoided and there are no feasible alternatives; and</p> <p>4. is not vulnerable to the natural hazard, taking climate change into account; and</p> <p>5. does not result in a reduction in the ability of people and communities to recover from a natural hazard event; and</p> <p>6. is designed to maintain reasonable and safe operation during and in the immediate aftermath of a natural hazard event.</p>	<p>Support with amendment</p> <p>A pathway is needed through this policy to allow for the upgrade of existing infrastructure in road reserve. In these instances there will always be an awareness from Infrastructure providers that they are in a hazard area, however upgrading the existing infrastructure in road reserve in the short term while discussions are ongoing about how to relocate the infrastructure in the long term means that the communities serviced by the infrastructure will continue to be serviced in both the short and long terms.</p>
INF-P25 Signs	Support
<p>Rules [Introduction]</p> <p>Note: For certain activities, a resource consent may be required by rules in more than one chapter in the District Plan. Unless expressly stated otherwise by a rule, resource</p>	<p>Oppose</p> <p>This appears to conflict with the advise provided at the introduction to the Infrastructure Chapter, which indicates that it is a standalone chapter. A standalone chapter is much</p>

PROVISION	FEEDBACK
<p>consent is required under each of those rules. The steps to determine the status of an activity are set out in the <i>General Approach Chapter</i>.</p> <p>Note: An activity may require consent under more than one rule. Plan users are required to review all rules in this chapter to determine the status of an activity.</p>	<p>simpler to understand for plan users, and as such, this introductory text should be amended to reflect the standalone nature. The statement also conflicts with the <i>General Interpretation of Rules</i> wording which is provided on the same page in the Infrastructure Chapter and states <i>Infrastructure activities are only subject to the objectives, policies, rules and standards in this chapter...</i></p>
<p><i>General interpretation of rules</i></p> <p>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.</p> <p>Infrastructure activities are only subject to the objectives, policies, rules and standards in this chapter and the Strategic Direction objectives, unless:</p> <ul style="list-style-type: none"> • the activity is a renewable electricity generation activity addressed in the Energy Chapter; or • the activity is associated with the nationally significant Waitaki Power Scheme addressed in the Energy Chapter, Part B: Waitaki Power Scheme; or • the activity is transport-related and addressed in the Transport Chapter; or • a rule specifically states otherwise. <p>National Environmental Standards:</p> <p>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 new transmission lines), the rules and standards in the District Plan apply.</p> <p>The installation and operation of telecommunications facilities (such as cabinets, antennas, poles, and telecommunications lines) undertaken by a facility operator are largely controlled by the Resource Management (National Environmental Standards for Telecommunications Facilities) Regulations 2016 (NESTF). The District Plan applies where telecommunications facilities are located within the following:</p> <ul style="list-style-type: none"> • SCHED2 – Historic Heritage Items • SCHED4 – Notable Trees • SCHED5 – Site and Areas of Significance to Māori • SCHED6 – Significant Natural Areas • SCHED7 – Outstanding Natural Features • SCHED8– Outstanding Natural Landscapes • Ōamaru Historic Area 	<p>Support with amendment</p> <p>The clarification the general interpretation section provides is appropriate (and needs to be made consistent across the chapter – see above). The following wording is suggested to provide alignment with the NESTF:</p> <p><i>The installation and operation of all telecommunications facilities (such as cabinets, antennas, poles, and telecommunications lines) within legal road, and some telecommunications facilities within private land that are undertaken by a facility operator are largely controlled by the Resource Management (National Environmental Standards for Telecommunications Facilities) Regulations 2016 (NESTF). The District Plan applies where telecommunications facilities are located within the following:</i></p> <ul style="list-style-type: none"> • SCHED2 – Historic Heritage Items • SCHED4 – Notable Trees • SCHED5 – Site and Areas of Significance to Māori • SCHED6 – Significant Natural Areas • SCHED7 – Outstanding Natural Features • SCHED8– Outstanding Natural Landscapes • Ōamaru Historic Area <p>Or the permitted standards of the NESTF are not met</p>
<p>INF-R1 The operation, maintenance and removal of existing infrastructure including any existing ancillary vehicle access tracks, outside an overlay</p>	<p>Support</p>
<p>INF-R2</p> <p>The maintenance and repair and removal of existing infrastructure including any existing ancillary vehicle access tracks within an overlay</p>	<p>Support with amendment</p> <p>Reference to Telecommunications Act should be to Telecommunications Act 2001</p>
<p>INF-R3 Upgrading of infrastructure, excluding transmission lines over 110kV, outside an overlay</p>	<p>Support</p>
<p>INF-R4</p>	<p>Support with amendment</p>

PROVISION	FEEDBACK
<p><i>Upgrading of infrastructure which is located on heritage items or within heritage settings identified in SCHED2 – Historic Heritage Items, or Sites and Areas identified in SCHED5 – Sites and Areas of Significance to Māori or within the Ōamaru Historic Area</i></p> <p><i>Per/RDis</i></p> <p><i>Permitted where infrastructure is an antenna</i></p>	<p>The rule should also provide for upgrading of customer connection lines. Many heritage buildings or buildings within heritage settings are serviced by existing customer connection lines, which from time to time need to be upgraded (such as from copper to fibre). The process is essentially replacing like with like, so should not necessitate a resource consent process.</p>
<p><i>INF-R5</i></p> <p><i>Upgrading of infrastructure other than roads located in an area identified in a Rural Scenic Landscape Overlay</i></p> <p><i>Per/RDis</i></p> <p><i>Permitted where the infrastructure is located underground or is above ground and within legal road.</i></p>	<p>Support with amendment.</p> <p>The term “existing road reserve” should be amended to “road reserve”. Road reserve is always existing, if it is old road reserve then it is no longer road reserve. Note the same applies to Rule INF-R25.</p>
<p><i>INF-R6</i></p> <p><i>Upgrading of infrastructure other than roads in the natural hazard overlay or coastal natural hazard overlay</i></p>	<p>Seek amendment to INF-R6 and INF-R9</p> <p>Exclude telecommunications from having to meet INF-R6 and INF-R9.</p>
<p><i>INF-R9</i></p> <p><i>Infrastructure located in the natural hazard overlay or coastal natural hazard overlay, excluding roads, walkways, cycleways and shared paths, and transmission lines and new transformers, substations, switching station and ancillary buildings for the electricity network, and water and wastewater treatment plants</i></p>	<p>Telecommunications infrastructure is significant and essential, and the safe, reliable and efficient functioning of the network is vital for the national, regional and local economy and is in the public interest both in terms of allowing people and communities to provide for their "wellbeing", and also for assisting to ensure their "health and safety".</p> <p>In terms of telecommunication networks, there are instances where existing infrastructure is located in what is proposed to be within a natural hazard overlay, and there are likely to be instances in the future where new infrastructure is proposed to be located within a natural hazard overlay.</p> <p>Typical telecommunications equipment that may need to be installed in natural hazards overlays to serve communities include telecommunications lines and support poles, equipment cabinets, and poles supporting antennas. Linear infrastructure such as lines may need to traverse a hazard area to reach a customer group. Place based telecommunications equipment may have functional and operational requirements to be located in hazard areas (e.g. a wireless telecommunications facility needing to be close to a customer group to provide services such as fixed wireless broadband).</p> <p>Much of the network equipment deployed by telecommunications companies is regulated by the Resource Management (National Environmental Standards for Telecommunications Facilities) Regulations 2016 (NESTF) which came into force on 1 January 2017.</p> <p>Under Regulation 57 of the NESTF, district plan rules in regard to natural hazard areas are specifically disappplied following a consideration of the risk profile of this type of equipment in making the regulations. Provided hazard areas are mapped in district plans, telecommunications providers can make decisions around route or site selection and any mitigation. For example, a telecommunications company may choose to place wireless telecommunications facilities in flood prone areas, with the radio equipment cabinet placed on an elevated plinth to reduce risk of water damage to radio equipment in a flood event.</p> <p>Telecommunications companies should be able to make their own decisions around the siting of their infrastructure rather</p>

PROVISION	FEEDBACK
	<p>than needing to potentially seek resource consents for such. This approach is reflected in Regulation 57 of the NESTF.</p> <p>The NESTF essentially provides an exemption from the natural hazard provisions of the draft District Plan for much of the typical telecommunications infrastructure components deployed, there are some notable exceptions. Poles and attached antennas in legal road are only regulated under the NESTF when they are within 100m of another pole in legal road. If such facilities cannot meet this requirement then the District Plan regulates the activity, and as such would come under the provisions proposed in Draft District Plan (if the site is within an overlay).</p> <p>The provisions of the NESTF allow telecommunication companies to undertake their duties as a lifeline utility under the Civil Defence and Emergency Management Act 2002 (CDEMA). The provision of resilient telecommunication networks during emergencies is critical, as has been highlighted recently with the Covid-19 pandemic, Kaikoura and Canterbury earthquakes. Telecommunications are recognised as Essential Infrastructure under the CDEMA, which applies to the whole network and a critical lifeline utility. As lifeline utilities Chorus, Spark and Vodafone are required to plan for and manage the range of emergency impacts on the networks. Under section 59 of the CDEMA a lifeline utility is required to take “all necessary steps to undertake civil defence emergency management” and be able, under section 60, to function to the fullest possible extent, even though this may be at a reduced level, during and after an emergency. Resilience comes from a variety of sources:</p> <ul style="list-style-type: none"> • multiple networks (different providers offering alternative networks); • multiple technologies (including fibre fixed networks available alongside mobile wireless networks); • telecommunication facilities such as cabinets and masts are exempt from the Building Act. However, the facilities are designed and certified by certified professional engineers that design for the natural hazards within any location; and • telecommunication providers build their own networks with resilience in mind (building redundancy into their networks so that network component failures have a minimum impact). <p>For these reasons, it is appropriate to exempt telecommunications from having to meet INF-R6 and INF-R9.</p>
<i>INF-R10 Cabinets and electric vehicle charge stations located outside any overlay</i>	Support
<i>INF-R11 Infrastructure located within existing buildings</i>	Support
<i>INF-R12 Infrastructure located on or within existing bridges and structures across streams</i>	Support Note, the telecommunication companies foresee a number of stream crossings are going to need to be reviewed and renewed, potentially in the lifetime of this District Plan, to ensure that they are resilient to climate change.
<i>INF-R13 Underground infrastructure, excluding transmission lines over 110kV, outside an overlay</i>	Support
<i>INF-R16 Infrastructure involving radiofrequency fields and electric and magnetic fields Per/RDis</i>	Seek amendment While this provision does not apply to Chorus, Spark and Vodafone (they are regulated under the NESTF), it is considered that there should be consistency between the District Plan and the NESTF in terms of permitted

PROVISION	FEEDBACK
<p><i>Permitted where standards are met, pole and antenna are located in any Commercial and Mixed Use Zones, Industrial Zones, General Rural Zone or Sport and Recreation Zone, NZS2772 met, and Infrastructure that emit electric and magnetic fields must comply with the International Commission on Nonionising Radiation Protection Guidelines for limiting exposure to time-varying electric and magnetic fields (1 Hz – 100 Hz), Health Physics 99(6):818-836; 2010, and the recommendations from the World Health Organisation monograph Environmental Health Criteria (No 238, 2007).</i></p>	<p>radiofrequency levels, and also the activity status if permitted radiofrequency levels cannot be met. Note under the NESTF, the activity status for when permitted radiofrequency levels cannot be met is Non Complying, and a non complying activity status better aligns with Draft District Plan Policy INF-P11 and its <i>avoid</i> setting, which is supported.</p>
<p><i>INF-R17</i> <i>Telecommunication poles, with or without associated antenna, and antenna attached to poles (not regulated by the NESTF) outside of any overlay</i> <i>Per/RDis/Dis</i> <i>Standards need to be met, and only certain zones specified. Commercial and Mixed Use Zones, Industrial Zones, General Rural Zone or Sport and Recreation Zone.</i></p>	<p>Telecommunications poles provide for infrastructure which serves land uses in all zones, therefore this rule needs to be amended to apply to all zones, not just the specified zones in the rule.</p>
<p><i>INF-R18</i> <i>Antenna attached to a building, including associated support structures (not regulated by the NESTF) outside of any overlay</i></p>	<p>Support</p>
<p><i>INF-R19</i> <i>Customer connection lines outside of any overlay</i> <i>Per/RDis</i> <i>Line must not include a new tower, and not exceed three additional poles, and diameter of cables is 30mm or less</i></p>	<p>Support with amendment The term <i>tower</i> is not defined in the Draft District Plan. It either needs to be defined so that it is clearly understood how it is different to a <i>pole</i>, or the term should be deleted from the rule.</p>
<p><i>INF-R20</i> <i>Temporary infrastructure and temporary electricity generators and selfcontained power units to supply existing infrastructure outside any overlay</i></p>	<p>Support</p>
<p><i>INF-R23</i> <i>Signs associated with the construction, operation, maintenance and repair or upgrading of infrastructure</i></p>	<p>Support</p>
<p><i>INF-R24</i> <i>New infrastructure not otherwise provided for or subject to any other rule in this chapter</i></p>	<p>Support</p>
<p><i>INF-R29</i> <i>Telecommunication poles, antennas and cabinets regulated by the NESTF that do not meet the permitted activity standards in Regulations 20, 21, 22, 27, 29, 31, 33, 35 or 37 of the NESTF</i></p>	<p>Support</p>
<p><i>INF-R32</i> <i>Upgrading of infrastructure located in an area identified in SCHED6 – Significant Natural Areas</i></p>	<p>Seek amendment Upgrading of any existing infrastructure with new equipment that is the same size or smaller than the equipment which is being replaced should be provided for as a permitted activity.</p>
<p><i>INF-R33</i> <i>Upgrading of infrastructure and new infrastructure, including any ancillary vehicle access tracks, but excluding roads, walkways, cycleways and shared paths, located in the root protection zone of a tree listed in SCHED4 – Notable Trees</i> <i>RDis</i></p>	<p>Seek amendment Upgrading of any existing infrastructure with new equipment that is the same size or smaller than the equipment which is being replaced should be provided for as a permitted activity.</p>
<p><i>INF-R37</i> <i>Any pole, line, mast, building, structure or support structure for infrastructure located more than 900m above sea level</i> <i>RDis</i></p>	<p>Seek amendment Is this rule needed given the extent of ONF/ONLs and SALs in the Draft District Plan? If it is considered necessary, then the rule should only apply to above ground infrastructure.</p>
<p><i>INF-R38</i> <i>Infrastructure, including any ancillary access tracks, excluding roads, walkways, cycleways and shared paths, located in an area identified in SCHED6 – Significant Natural Areas</i> <i>Dis</i></p>	<p>Seek amendment Upgrading of any existing infrastructure with new equipment that is the same size or smaller than the equipment which is being replaced should be provided for as a permitted activity.</p>

PROVISION	FEEDBACK
<p><i>INF-R39</i> <i>Upgrades to existing infrastructure and new infrastructure, including any ancillary access tracks, excluding roads, walkways, cycleways and shared paths, which is located in an area identified in SCHED7 - Outstanding Natural Features, SCHED8 – Outstanding Natural Landscapes, SCHED2 - Historic Heritage Items, SCHED5 - Sites and Areas of Significance to Māori or the Ōamaru Historic Area</i> <i>Dis</i></p>	<p>Seek amendment Upgrading of any existing infrastructure with new equipment that is the same size or smaller than the equipment which is being replaced should be provided for as a permitted activity.</p>
<p><i>INF-S1 Upgrading – All Zones</i></p> <ol style="list-style-type: none"> <i>1. The realignment, relocation or replacement of a telecommunication line, pipe, pole, tower, conductor, cross arm, switch, transformer or ancillary structure must be within 5m of the existing alignment or location;</i> <i>2. a pole must not be replaced with a tower;</i> <i>3. a replacement pole, tower or telecommunication pole must not exceed a height, whichever is the lesser, of the following:</i> <ol style="list-style-type: none"> <i>a) 25m; or</i> <i>b) the height of the replaced pole or tower or telecommunication pole, as of [insert date of notification of the Plan], 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;</i> <i>4. the diameter or width of a replacement pole or telecommunication pole:</i> <ol style="list-style-type: none"> <i>a) must not exceed twice that of the replaced pole at its widest point; or</i> <i>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 [insert date of notification of the Plan], at its widest point; and</i> <i>5. a replacement tower's footprint must not exceed the width of the tower, as of [insert date of notification of the Plan], by more than 25%;</i> <i>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;</i> <i>7. additional conductors or lines:</i> <ol style="list-style-type: none"> <i>a) must not increase the number of conductors or lines, as of [insert date of notification of the Plan], by more than 100%; and</i> <i>b) must not exceed a 50mm diameter; and</i> <i>8. there must be no additional towers;</i> <i>9. the number of additional poles required to achieve the conductor clearances required by NZECP 34:2001 must not exceed two;</i> <i>10. additional cross arms must not exceed the length of the existing cross arm by more than 100%, up to a maximum of 4m;</i> <i>11. the diameter of replacement pipes must not exceed the diameter of the replaced pipe by more than 300mm;</i> <i>12. the realignment, relocation or replacement of any other infrastructure, structure or building:</i> <ol style="list-style-type: none"> <i>a) must be within 5m of the alignment or location of the original structure or building;</i> <i>b) must not increase the footprint of the structure or building by greater than 30%; and</i> 	<p>Support with amendment The scale within which upgrading can occur is clear. There are terms in the rule which are undefined, such as <i>tower</i> and <i>telecommunication pole</i>. However <i>pole</i> is defined in the Draft District Plan, and other than for this standard, there is no need to define <i>telecommunication pole</i>. A minor rewrite is necessary to ensure the standard achieves everything it sets out to do.</p>

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<p>13. a replacement panel antenna must not increase the face area, as of [insert date of notification of the Plan], by more than 20%;</p> <p>14. a replacement dish antenna must not increase in diameter, as of [insert date of notification of the Plan], by more than 20%.</p>	
<p>INF-S2 Upgrading – with respect to Historic Heritage Items and their settings and Sites and Areas of Significance to Māori or within the Ōamaru Historic Area – All Zones</p> <p>1. A replacement antenna colour must be the same colour as the building or structure;</p> <p>2. a replacement panel antenna must not increase the face area as of [insert date of notification of the Plan] by more than 20%;</p> <p>3. a replacement dish antenna must not increase in diameter as of [insert date of notification of the Plan] by more than 20%.</p>	<p>Support with amendment</p> <p>Replacement customer connections also need to be provided for. The following standards are suggested</p> <p>4. No new support poles are required.</p> <p>5. The new or replaced connection work does not involve a change or addition to the exterior of the building, with the exception of small (less than 0.1m³ in volume) customer connection boxes which are not affixed to the primary façade of the building to which they are being attached</p>
<p>INF-S3 Height - masts, antennas, lines and single pole support structures, including anemometers, extreme weather and tsunami warning devices, air and marine navigational aids (not regulated by the NESTF)</p> <p>All Residential, Settlement, Rural Lifestyle, SPZ – Lakes and Town Centre Zones</p> <p>1. The infrastructure must not exceed a maximum height above ground level of 12m (single provider);</p> <p>2. the infrastructure must not exceed a maximum height above ground level of 15m (two or more providers).</p> <p>All other zones</p> <p>3. the infrastructure must not exceed a maximum height above ground level of 25m (single provider);</p> <p>4. the infrastructure must not exceed a maximum height above ground level of 30m (two or more providers).</p>	<p>Seek amendment</p> <p>The permitted heights in all zones under this standard need to be at least 5m higher than permitted building heights to ensure antennas can adequately perform, and provide appropriate health and safety clearances.</p> <p>Further, a permitted height of 25m should be provided in the Rural Lifestyle zone to align with the permitted baseline that is set by the NESTF.</p> <p>Lastly, there is a preference for the permitted height in the rural zone to be 40m, to seek adequate clearance above shelter belts, which can otherwise have a significant detrimental impact on the efficacy of signals to and from antenna.</p>
<p>INF-S4 Size – ground mounted support structures (not regulated by the NESTF)</p> <p>All other zones</p> <p>1. A pole must not exceed a maximum diameter of 1.3m (single provider);</p> <p>2. a pole must not exceed a maximum diameter of 1.5m (two or more providers).</p> <p>Industrial Zones</p> <p>3. a pole must not exceed a maximum diameter of 1.5m.</p>	<p>Support with amendment</p> <p>The name should be changed to poles, if that is what the standard is seeking to achieve. Ground mounted support structures is not a term used anywhere else in the country. The pole diameters are supported.</p> <p>Some poles are square structures and as such do not have a diameter. 2.5m would be an appropriate width control for such structures.</p>
<p>INF-S5 Height – building mounted antennas and associated support structures (not regulated by the NESTF)</p> <p>All zones</p> <p>1. The infrastructure must not exceed a maximum height above the highest point of the roof of 3m (single provider);</p> <p>2. the infrastructure must not exceed a maximum height above the highest point of the roof of 5m (two or more providers).</p>	<p>Support with amendment</p> <p>This standard should be aligned with the permitted baseline created by the NESTF, which is 5m above the building to which the antennas is attached in all zones, but in residential is only applicable to existing buildings which have a height of 15m above ground level.</p>
<p>INF-S6 Size and diameter – antenna attached to a telecommunication pole (not regulated by the NESTF)</p> <p>General Rural and Industrial Zones</p> <p>1. An antenna attached to a pole must be contained within a horizontal circle with a maximum diameter of 5m.</p> <p>All other zones</p> <p>2. An antenna attached to a pole must be contained within a horizontal circle with a maximum diameter of 750mm.</p>	<p>Support with amendment</p> <p>This standard should be aligned with the permitted baseline created by the NESTF, which allows for head units of 6m wide in all rural zones (including rural lifestyle). Further, the antenna sizes suggested for INF-S7 below should be incorporated into this standard.</p>
<p>INF-S7 Size and diameter - antenna attached to buildings (not regulated by the NESTF)</p> <p>Industrial, Commercial and Mixed Use Zones</p>	<p>Support with amendment</p> <p>The diameter proposed is sufficient. The standard only provides for dish antenna, which are measured in diameter. Panel antenna are also attached to building. These have a</p>

PROVISION	FEEDBACK
<p>1. An antenna attached to a building must not exceed a maximum diameter of 2m. General Rural Zone</p> <p>2. An antenna attached to a building must not exceed a maximum diameter of 2.5m. All other zones</p> <p>3. An antenna attached to a building must not exceed a maximum diameter of 1.2m.</p>	<p>rectangular shape and are measured in area (m²). The suggested antenna size in each zone are: <i>Industrial, Commercial and Mixed Use Zones</i></p> <p>1. An antenna attached to the exterior of a building must not exceed a maximum diameter of 2m or a face area of 1.5m². <i>General Rural Zone</i></p> <p>2. An antenna attached to the exterior of a building must not exceed a maximum diameter of 2.5m or a face area of 1.5m². <i>All other zones</i></p> <p>3. An antenna attached to the exterior of a building must not exceed a maximum diameter of 1.2m or a face area of 1.5m².</p>
<p>INF-S8 Cabinets, electric vehicle charging stations, 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 are located within the road reserve or rail corridor</p>	Support
<p>INF-S9 Cabinets, electric vehicle charging stations, 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 are not located within the road reserve or rail corridor</p>	Support
<p>INF-S10 Setbacks – all new Infrastructure not located in the road reserve or rail corridor, excluding infrastructure that crosses a river along a bridge or structure</p>	Support
<p>INF-S11 Setbacks – poles and antenna not located in the road reserve or rail corridor All zones</p> <p>1. No pole or antenna must be located within: a) a 10m setback from a site boundary that adjoins a Residential Zone; b) a 15m setback from any intersection in the General Rural Zone, Special Purpose Zone – Macraes Mining or Rural Lifestyle Zone.</p> <p>2. Clause 1 does not apply to the boundary of the road reserve.</p>	<p>Support with amendment A setback of 10m from a site boundary the adjoins a residential zone (with the exception that this does not apply to a road boundary) is accepted. However it is unclear what is meant under 1(b), and what effect this is seeking to control. As such, 1(b) should be deleted in its entirety.</p>
<p>INF-S12 Setbacks – cabinets, electric vehicle charging stations, temporary infrastructure and temporary electricity generators, 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 All zones</p> <p>1. No infrastructure must be located within a 2m setback from any site boundary.</p>	<p>Oppose Cabinets are typically small structures and are best suited tucked near a property boundary. A setback is not necessary (noting noise standards apply). As such, this standard should be deleted in its entirety. If Council wish to keep this standard, then any boundary adjoining road reserve should be excluded.</p>
<p>INF-S13 Earthworks – Slope, Height, Depth</p>	Support
<p>INF-S14 Earthworks - area in a 12 month period per site, excluding the road reserve and rail corridor</p>	Support
<p>INF-S15 Earthworks – in relation to Historic Heritage and Sites and Areas of Significance to Māori</p>	Support
<p>INF-S16 Earthworks – in relation to Outstanding Natural Features and Landscapes and Rural Scenic Landscape Overlays</p>	Support
<p>INF-S17 Trimming, pruning or removal of indigenous vegetation and earthworks within an area identified in SCHED6 - Significant Natural Areas</p>	Support

PROVISION	FEEDBACK
<p><i>INF-S18 Trimming, pruning or removal of indigenous vegetation outside of an area identified in SCHED6 - Significant Natural Areas</i></p>	<p>Oppose INF-S17 allows the trimming of native vegetation without an arborist in an area where native vegetation is protected. INF-S18 requires an arborist for the trimming of native vegetation in an area where native vegetation is not protected. INF-S18 should at the very least have a permitted level of trimming that is the same as INF-S17 without arboricultural input.</p>
<p><i>INF-S19 Signs</i></p>	<p>Support</p>
<p><i>INF-Standards</i> Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> <i>1. local, regional and national benefits; and</i> <i>2. the effect on the streetscape and amenity of the area; and</i> <i>3. the extent to which co-location of the infrastructure is technically or practicably possible to minimise their visual impact; and</i> <i>4. design and siting of the mast, pole or support structure; and</i> <i>5. any offset or compensation measures offered; and</i> <i>6. any operational or functional needs of the infrastructure; and</i> <i>7. whether topographical and other site constraints make compliance with the permitted standard impractical.</i> 	<p>Support with amendment The standard matters of discretion used in the Infrastructure standards include <i>offset and compensation measures</i>. In our experience relate solely to indigenous biodiversity and would apply if INF-S17 is exceeded. This should be the only instance in which it is triggered, not throughout most matters of discretion.</p>
<p>OTHER CHAPTERS</p>	
<p>Introduction to:</p> <ul style="list-style-type: none"> - Natural Hazards - Historic Heritage - Notable Trees - Sites and Areas of Significance to Māori - Ecosystems and Indigenous Biodiversity - Natural Character - Natural Features and Landscapes - Coastal Environment - Earthworks - Signs - Temporary Activities - All zone chapters 	<p>Include a note in the introduction to these chapters that the provisions within these chapters do not apply to Infrastructure. This is appropriate given the infrastructure chapter has provisions addressing infrastructure in these overlays.</p>
<p>SUBDIVISION</p>	
<p><i>SUB-O3 - Infrastructure</i> Subdivision is serviced by infrastructure that has been planned and provided for in an integrated manner and has sufficient capacity for the development of the land.</p>	<p>Support</p>
<p><i>SUB-O4 Subdivision and Regionally Significant Infrastructure</i> Subdivision does not compromise the operation or safety of Regionally Significant Infrastructure.</p>	<p>Support</p>
<p><i>SUB-P1 Creation of allotments</i> Enable subdivision that creates allotments which:</p> <ol style="list-style-type: none"> <i>1. reflect the intended pattern of development and are consistent with the anticipated role, character and amenity values of the zone; and</i> <i>2. are of a size and dimensions that are sufficient to accommodate the intended or anticipated use and development form for the applicable zone.</i> 	<p>Support</p>
<p><i>SUB-P3 Provision of infrastructure</i> Require infrastructure to be provided in an integrated and comprehensive manner by:</p> <ol style="list-style-type: none"> <i>1. ensuring that the subdivision will be appropriately serviced and integrated with existing and planned infrastructure; and</i> <i>2. ensuring that infrastructure meets WDC standards and has sufficient capacity to accommodate the development or anticipated future development ; and</i> 	<p>Support</p>

PROVISION	FEEDBACK
<p>3. requiring infrastructure to be installed at the time of subdivision; and</p> <p>4. requiring connections to reticulated systems, where reticulation services are available for the allotment, or are within close proximity to the site; and</p> <p>5. ensuring that appropriate on-site wastewater, stormwater and water supply infrastructure, with sufficient capacity for firefighting purposes, is provided on-site where reticulated services are not available for the site; and</p> <p>6. ensuring telecommunications and power supply is provided to all allotments.</p>	
<p><i>SUB-P5 Subdivision for network utilities</i> Control the creation of allotments for the purposes of a network utility, or network utility structure, to ensure that the lot is a sufficient size to accommodate its required use.</p>	Support
<p><i>SUB-P6 Effects of subdivision on infrastructure</i> Require subdivisions to be designed to minimise any adverse effects on the safe and efficient operation, maintenance of, and access to Regionally Significant Infrastructure.</p>	Support with amendment The wording <i>designed to minimise any adverse effects</i> is open to interpretation. This could be more directive in order to avoid, remedy or mitigate reverse sensitivity effects.
<p>Rule framework SUB-R1 SUB-R2 SUB-R3</p>	Support
<p><i>SUB-R5 - Subdivision of land solely to create an allotment for the purpose of public works, infrastructure, reserves or access</i> <i>Con/RDis</i> Control over physical/legal access and balance lots compliance with standards</p>	Support. Controlled activity is good as don't have to meet the standards
NOISE	
<i>Objectives and Policies</i>	Supported
<i>Noise rules</i>	Has monitoring been done to ensure that the noise standards in NOISE-R1 to NOISE-R6 are appropriate for the background levels of each zone? In our experience, the noise limits are relatively low, particularly in the Rural Lifestyle zone.