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Report on submissions to the Auckland City District Plan: Hauraki Gulf Islands Section – Proposed 2006

Topic: Network Utility Services (Landscape)

The landscape architect's input to the following report has been prepared to assist in the preparation of the report on submissions received to the Auckland City District Plan: Hauraki Gulf Islands Section – Proposed 2006. This report focuses on specific issues raised in relation to the landscape effects that the utilities may have, and contains recommendations for the hearings committee in response to submissions received. The specific topics that this report focuses on are listed in the order relative to the Utilities chapter in the Proposed Plan, as follows:

4.10.2.1 Submission 33/1, 1112/1,

Submission 33/1

The relevant provisions in activity table 5.5.1 are:

Row 9 – *“Any aboveground telecommunication, electricity or wastewater network utility that has an area not exceeding 2m² in plan view and does not exceed 1.6m in height (excluding plinth) provided that this rule excludes masts and antennas”* – **Permitted activity.**

Row 18 - *“Any aboveground telecommunication, electricity or wastewater network utility that has an area exceeding 2m² in plan view and exceeds 1.6m in height (excluding plinth) provided that this rule excludes masts and antennas”* – **Restricted Discretionary activity.**

This submission supports in principle the use of rules with specific dimensions for utility structures in road reserve, but opposes the proposed activity rules with respect to utilities outside legal road.

Submission 33/1 is accepted in part. The dimensions stated in rows 9 and 18 in the activity table are of a reasonable limit to allow the majority of telecommunication cabinets as a permitted activity. The submitter is concerned that the rules would essentially make all other structures and buildings associated with the telecommunication network outside of the legal road require restricted discretionary activities in many land units.

The submission does not specifically state what other structures and buildings the submitter currently installs which may not meet the permitted activity control.

Land units which allow buildings as a permitted activities are:

- Landform 3 (alluvial flats)
- Landform 5 (productive land)
- Island residential 1 (traditional residential –except coastal amenity area)
- Commercial 3 (local shops)
- Commercial 6 (Quarry)
- Commercial 7 (Wharf)

Great Barrier Island Settlement areas are divided into sub areas. The following sub areas allow buildings as permitted activities:

- Residential amenity area
- Visitor accommodation area
- Claris light industry area
- Mulberry Grove School, and Okiwi School and Domain areas

All other land units and sub areas within settlement areas require a restricted discretionary or non-complying resource consent application for buildings/structures. These land units exhibit high landscape or visual amenity value thereby requiring a greater degree of control.

The government has recently confirmed National Environment Standards (NES) for telecommunication cabinets in the road reserve:

Telecommunication cabinets in road reserves shall be permitted activities subject to the following restrictions:

Limitations on cabinet size and location (Above ground level)	Adjacent area type
<i>Maximum height: 1.8m</i> <i>Maximum footprint of any single cabinet: 1.4m²</i> <i>Maximum footprint occupied by all cabinets: 1.8m²</i> <i>Maximum number of network utility cabinets exceeding 900mm in height in any location: one¹</i> <i>Minimum separation distance from any existing utility cabinet exceeding 900mm in height: 30m</i> <i>(except where specific provision by way of dedicated areas has been made for utilities infrastructure within the road reserve)</i>	<i>Residential</i>
<i>Maximum height: 2m</i> <i>Maximum footprint: 2.0m²</i> <i>Minimum separation distance from any existing utility</i>	<i>Non-residential</i>

<p><i>cabinet exceeding 900mm in height: 30m</i></p> <p><i>(except where specific provision by way of dedicated areas has been made for utilities infrastructure within the road reserve)</i></p>	
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¹ Cabinets in new subdivisions are often located in areas allocated for utilities, for example dedicated areas of road reserve are provided. In these cases it would be considered a reasonable condition of a Road Opening Notice that the cabinets be located within those areas.

¹ Areas identified as historic, historic heritage, cultural sites or open space

While the standards are limited to telecommunication cabinets it is considered that these size thresholds would be appropriate for managing aboveground cabinets of all types within private property. If the above thresholds can be met in the appropriate land unit identified above then permitted activity status can be afforded these activities.

If the above standards located on the identified land units cannot be met then a resource consent application to exceed the threshold or a designation should be sought. These methods will allow a greater degree of assessment and control of the visual effects of utility structures given the utilitarian nature of utility equipment and the visual effects of such services.

Masts and antennas are exempted because of the generally slim line nature of equipment and also the activity table expressly provides for them by specific rules.

As currently worded, the relief sought in the submission would contradict Row 22 of the activity table. Therefore any relief recommended would be specifically related to aboveground structures exceeding area of 2m² and height of 1.6m excluding masts and antennas.

For the above reasons, it is recommended that submission 33/1 be accepted in part and that the following rules be provided for as permitted activities throughout the islands:

Aboveground telecommunication, electricity or wastewater network utility in Island Residential 1 (traditional residential-except coastal amenity area) and Settlement Area sub area-(Residential amenity area) that meets the following:

- *Maximum height: 1.8m*
- *Maximum footprint of any single cabinet or structure: 1.4m²*
- *Maximum footprint occupied by all cabinet or structure: 1.8m²*

Provided that this rule excludes masts and antennas

and

Aboveground telecommunication, electricity or wastewater network utility in Landform 3 (alluvial flats), Landform 5 (productive land), Commercial 3 (local shops), Commercial 6 (Quarry), Commercial 7 (Wharf), Settlement Area sub area-(Visitor accommodation area, Claris light industry area, Mulberry Grove School and Okini School and Domain areas) that meets the following:

- *Maximum height: 2m*
- *Maximum footprint of any single cabinet or structure: 2.0m²*

Provided that this rule excludes masts and antennas

Submission 1112/1

The submission seeks that aboveground utilities be located within the legal road reserve, have an area not exceeding 2m² in plan view and 1.8m in height (including plinth) as a permitted activity -**Row 9 of activity table**. A minor grammatical change is also sought and supported.

The government has recently introduced National Environmental Standards (NES) for telecommunication facilities in the road reserve.

While these standards apply to telecommunications, they do not apply to electricity and wastewater facilities.

It is recommended that the reference to telecommunication be deleted in Row 9 of the activity table to reflect the standards introduced.

In effect, the NES permits telecommunication facilities to be located in the road reserve as of right (subject to restrictions). These restrictions are generally based on size limits and location.

The aspect of the submission for utility services to be located within the legal road reserve is also supported as the new National Environmental Standards (NES) for telecommunication facilities provides size thresholds. These size thresholds should also apply to electricity and wastewater network services. The council would still need to control visual amenity effects from these utility services within the road reserve if the size thresholds were to be exceeded.

There are some instances where legal road reserve traverses sensitive land units and significant heritage areas in an unformed state. All matters of development in this respect require a resource consent for assessment. The activity table has also been drafted so that various utilities are permitted in 'formed legal road' where the environment has been modified and that any environmental effect of various additional utility services can be considered minor. However, any proposal or modification of 'unformed legal road' requires resource consent assessment due the unmodified nature of the legal road and that any modification can be assessed to consider whether there are any significant environmental effects. The planning maps identify 'unformed legal road'. In preparing the proposed rule, it was considered that the modifications that occur through road formation are such that the additional effect of utilities that would be permitted by this rule would be no more than minor. However, this does not apply to areas of unformed road, which may be through sensitive environments and landscapes. For this reason, maintaining the permitted status only in relation to formed legal road is recommended.

The submission seeks the height of aboveground utility services be increased from 1.6m (excluding plinth) to 1.8m (including plinth). The standard as it is currently worded could be interpreted as having a greater overall height of 1.6m due to the unspecified height of the plinth. The proposed amendment to the rule specifies a maximum height of 1.8m including plinth so the combination of cabinet and plinth could vary. This amendment is supported given the minor difference in height. In addition, the size thresholds would also be consistent with the NES for telecommunications. This amendment only applies to formed

legal road adjacent to residential land. A new activity is required to be added to the activity table in clause 5.5.1 of the plan and be provided as a permitted activity:

Any aboveground electricity or wastewater network utility within formed legal road reserve that has an area not exceeding 1.8m² in plan view, does not exceed 1.8m in height (including plinth) and is located adjacent to residential land units provided that this rule excludes masts and antennas.

The size thresholds for telecommunication facilities in the road reserve adjacent to non-residential land are more permissive. This also needs to be reflected in the activity table so that row 9 of the activity table in clause 5.5.1 of the plan and any consequential amendments in the plan be amended to read:

Any aboveground ~~telecommunication~~, electricity or wastewater network utility within formed legal road reserve that has an area not exceeding ~~of~~ 2m² in plan view, does not exceed ~~4.6m~~ 2.0m in height (~~excl~~-including plinth) and is located adjacent to non-residential land units provided that this rule excludes masts and antennas.”

Submission 33/5, 941/26(e)

Submission 33/5

The submission seeks that Row 17 of the activity table in clause 5.5.1 be amended to include overhead lines adjacent to formed legal roads in the Rural 1 (rural amenity), Rural 2 (Western Landscape) and Rural 3 (Rakino Amenity) land units as a permitted activity. This is supported in part.

The Rural 1 (rural amenity) is applied to pockets of small scale, rural land located between the village areas of western Waiheke. Part 10a.19 states that Rural amenity is characterised by:

- Small scale farming and horticulture activities
- Flat to rolling land
- A rural landscape with built elements but also the openness, features and patterns created by productive activities.
- The contrast of its rural landscape with the intensity and nature of the surrounding village development.

The plan also recognises the land unit adjoining Onetangi Road differs from the other areas of rural amenity land in that it contains activities that may be considered ‘non-rural’ in character such as wineries and complexes.

Overall, the land unit has a high visual amenity value, largely due to the contrast of its landscape with the village style development that occurs throughout western Waiheke. Two key issues for the land unit are:

1. How to protect the rural landscape and visual amenity of the land unit, from the adverse effects of buildings and activities.
2. How to protect the general amenity of the land unit, particularly in the ‘other areas’

The plan recognises that formed legal road is not classified with a land unit. However, the key question is whether the roads adjacent to rural 1 is considered 'rural'. Currently, overhead lines exists along the legal road reserve adjacent to the Rural 1 land unit. It is acknowledged that telephone lines are typically deployed overhead in rural areas throughout New Zealand due to the high costs of serving small numbers of customers over large distances.

However, it is considered that the current landholdings classified as Rural 1(rural amenity) is not the typical 'rural' landscape given its close proximity to built up urban areas and is more akin to a 'rural-amenity landscape. The rural character of this land unit is enjoyed by the neighbouring residential communities, and the productive capacity of this rural land is of lesser importance than its amenity function. The 'rural' landscape more typical of New Zealand is located at the eastern end of Waiheke, and is classed as Landform 5 (Productive Land). The proposed rule already allows for overhead lines as permitted activities in landform 1-7.

It is acknowledged however that rural 1 does exhibit a degree of rural amenity character and given there are existing overhead lines for both telecommunications and electricity, it is considered that overhead lines can be permitted to the extent that it applies to existing formed legal road existing at the date of notification of the plan.

There is the possibility that there will be further subdivision and development within the rural 1 land unit (including new roads) will 'intensify' the character of the land unit. Any provision for further overhead lines in formed legal road as a permitted activity should be limited to the existing roads and that any services provided as a result of further subdivision and development within rural 1 should be underground. This is consistent with the policy of requiring underground services for subdivision (Part 12 of the plan) and new development.

The rural 2 land unit occupies land that could be well described as 'rural-residential' landscape. It is interspersed with houses in Western Waiheke and Te Whau, which have been formed as comprehensive developments amongst the rural farmland. To allow the introduction of overhead lines into these areas, which have been developed with such services being underground, would detract from the high visual amenity that has been achieved through these developments to date.

The rural 3 land relates to Rakino, which does not have overhead lines at present. To allow new overhead lines to be introduced as permitted activities across an island that currently does not have overhead lines would permit them to detract from the amenity values of the existing landscape.

For the above reasons it is recommended that Row 17 of the activity table in clause 5.5.1 be amended to read:

(underline indicates additions)

New overhead telecommunication and/or electricity distribution lines in formed legal road adjoining landform 1-7 and rural 1 provided that for rural 1 this rule shall apply to formed legal roads existing at 18 September 2006.

Submissions 33/6, 1113/1, 1113/2

These submissions oppose the restriction of the number of antennas that are attached to buildings. Submission 33/6 states that between six and nine antennas are typically mounted on buildings especially in high density urban areas and therefore seeks that no limit be imposed on the number of antennas attached to buildings.

Submission 1113/1 and 1113/2 states that telecommunication facilities require at least three panel antennas to enable 360° coverage (120° per sector) plus two dish antennas. The gulf islands have relatively large separation distances and therefore most cellular facilities require both receiving and sending microwave dish antenna to link the facility with other sites within the network. A total of five antennas is therefore a minimum technical requirement.

The number of antennas located on existing buildings is limited to two antennas as a greater number has the potential to be visually intrusive. It is acknowledged that a greater number of antennas would provide greater coverage over the islands for cellular telecommunication facilities. However, given the village nature of the islands and the relatively small scale of the built up areas and villages (as opposed to the isthmus or CBD), five or more antennas on a building has the potential to be visually intrusive in areas such as Oneroa village, Ostend village and other land units throughout the islands. Additionally, due to the relatively low height of most buildings, antennas can be more easily seen than they may be on tall buildings such as are located in the CBD. Two antennas as a permitted activity in all land units would allow a greater dispersion of antennas throughout the islands and lessen the visual impact as opposed to a greater concentration of antennas in one area which has a greater visual impact on that specific area.

The assessment criteria for a restricted discretionary activity for three or more antennas attached to a building is limited to:

- Design, external appearance and visual effects
- Site layout and placement
- Height and proportion
- Other environmental effects including noise, vibration, odour, dust, discharges to air and water, lighting and spill lighting, hazardous substances and vehicle movements
- Removal of redundant services
- Co-location
- Cumulative visual effects
- Heritage
- Radio frequency fields

The above matters may be treated on a non-notified basis or without the need to obtain written approval of or serve notice on affected persons.

With a greater number of telecommunication companies being established in New Zealand it is important that the council exercises a degree of control on the visual effect of antennas located on buildings. Given that new technology is constantly evolving in the telecommunications industry (e.g 3g etc), there is likely to be an increase in the demand for cellular sites throughout the island.

It is important that such sites be assessed for appropriateness in terms of the visual effects of antennas and other criteria as stated above. Given the unique village nature and relatively

low density of population on the islands it is considered that there is the potential for adverse visual effects and that two antennas per building as a permitted activity is considered appropriate. Any number greater than two should be assessed to determine the appropriateness of the site/building.

Pending further information at the hearing from the telecommunication companies explaining the technical requirements for cellular sites, it is recommended that submissions 33/6, 1113/1 and 1113/2 be rejected for the above reasons.

Submissions 941/26

This submission seeks several changes to the activity table in clause 5.5.1. These will be dealt with in turn in the summary of submissions:

- (b) Row 4 of the activity table relates to the bundling of existing overhead telecommunication and electricity lines, provided that the new line does not exceed 40mm in diameter.

The submission states that for practical and operational reasons the permitted diameter be increased to 50mm, and that bundled lines to be comprised of 40mm is not always possible and some flexibility should be provided for.

This submission is not supported. The rationale for bundling of existing lines is supported to the extent that less overhead lines will be visible. However, a result of the bundling will be a “fatter” cable. It is considered that 40mm will be sufficient diameter to minimise any adverse visual effects and is of a sufficient width to accommodate most operational and practical needs. Any additional increase in diameter should be assessed for any visual effects. Furthermore, the diameter is also consistent with the diameter proposed for the activity in Row 14 of the activity table.

- (c) Row 9 of the activity table relates to aboveground telecommunication, electricity and wastewater network utilities not exceeding 2m² (plan view) in area and a maximum height of 1.6m.

The submission opposes the standards as the dimensions are too restrictive and unreasonable because the submitter’s aboveground equipment would not be able to comply with the dimensions. The submission proposes a maximum area of 6m² in area (plan view) and a maximum height of 1.75m.

The dimensions as notified in the plan reflect the councils desire to standardise all above ground equipment in relation to size. This is to minimise adverse visual amenity effects due to the utilitarian nature of utility equipment. It is acknowledged that this may be the case of where the function of equipment often dictates the size and appearance and as a result, the standard is seen as too restrictive. The submission does not specifically mention the number and exact types of equipment that maybe required and there maybe a case whereby some equipment could be permitted.

Any thresholds for permitted activity status should be investigated as there needs to be a balance between providing for equipment that have little effect on visual amenity and the need to provide a functional standard that meets the majority of equipment needs of the utility providers. Any threshold standard should not always mean that all equipment should have permitted activity status. Rather, the 2m2 proposed standard for permitted activities is considered an appropriate maximum size for all specified situations, beyond which size the activity would be assessed on its effects. To raise the permitted standard to 6m2 may better meet the functional requirements of the utility operator, but would add to their visual dominance and provide the ability for their construction irrespective of the sensitivity of the receiving environment.

The submitter may also designate sites if the equipment is of a sufficient size and importance to the network. This could help mitigate any visual effects by conditions such as landscaping being imposed on the designation.

The proposed standard as submitted is also of a substantial size that can adversely affect the road reserve with respect to visual amenity and traffic and roading considerations. In addition, the proposed increase in standard size as a permitted activity, would also apply to telecommunications and wastewater aboveground services.

For the above reasons, it is recommended that submission 941/26(c) be rejected.

- (d) Row 14 of the activity table relates to the provision of an additional overhead broadband internet distribution line on existing support poles provided that the additional line does not exceed 40mm in diameter as a permitted activity.

The submission supports this activity. This submission is supported as the addition of one line would have minimal visual amenity effects where existing lines overhead lines exist. It is also considered that the provision of broadband internet is consistent with the New Zealand Governments strategic direction for providing ease of access to broadband. In addition, the low density (population and built form) nature of the islands would make undergrounding of a new line cost prohibitive.

It should also be acknowledge that this activity applies to existing lines and support poles. Where there are underground lines and no existing overhead lines and support poles, undergrounding of the additional broadband internet line is required. Alternatively a resource consent will be required for the overhead line.

In this case, it is considered that the provision of an additional overhead line would have minimal visual effect and on balance would provide for the communities economic, social and cultural well being.

- (e) Row 17 of the activity table provides for new overhead telecommunication and electric distribution lines in formed legal road adjoining landform 1-7 as a permitted activity. The submission seeks that it would also be appropriate to extend this to Rural 1, 2 and 3 as it is considered the cost of undergrounding these rural areas is cost prohibitive and that rural roads usually do not have formed sidewalks in which to install cables.

Rural 1(rural amenity) is not the typical 'rural' landscape given its close proximity to built up urban areas and is more akin to a 'rural-amenity' landscape. The rural character of this land unit is enjoyed by the neighbouring residential communities, and the productive capacity of

this rural land is of lesser importance than its amenity function. The 'rural' landscape more typical of New Zealand is located at the eastern end of Waiheke, and is classed as Landform 5 (Productive Land).

The rural 2 land unit occupies land that could be well described as 'rural-residential' landscape. It is interspersed with houses in Western Waiheke and Te Whau, which have been formed as comprehensive developments amongst the rural farmland, with underground services.

The rural 3 land relates to Rakino, which does not have overhead lines at present.

For the above reasons, it is recommended that submission 941/26(d) be partially accepted as it applies to existing overhead lines in Rural 1, but not in Rural 2 or 3.

Submission 1112/3

This submission also relates to submission 1112/1 and 1112/2. The submission states that activities in rows 9 and 18 of the activity table provide no distinction between the location of aboveground network facilities, that is either in the road reserve or on private land. The submitter considers the provisions of rows 9 and 18 should only relate to structures in the legal road reserve. In other areas (i.e not legal road reserve), it is considered that aboveground facilities should be subject to the relevant bulk and location standards of the underlying zone.

The submission states that the size of equipment cabinets are primarily dictated by function, and the need to contain certain components and that it is not a case of making equipment cabinets smaller to meet smaller dimension controls. It is for these reasons that there are supply and operational problems with meeting the permitted sizes for aboveground structures in the plan.

This submission is not supported. The thresholds of aboveground utility services have been developed to take into account the sizes of aboveground equipment. It is considered that the thresholds would cater for the majority of the cabinets/equipment used by the utility companies. There will be some instances where the cabinets/equipment are of such a size that a resource consent should be required for assessment regardless of whether it is located within the road reserve or private land. One of the primary reasons being that the use of the site specifically for utility purpose may detract from the amenities of the area and can have adverse effects (particularly visual amenity) that are not normally associated with the relevant land units use.

For the above reasons, it is recommended that 1112/3 be rejected.

Submission 1114/1, 1114/2

Rural 1 (rural amenity) is not the typical 'rural' landscape given its close proximity to built up urban areas and is more akin to a 'rural-amenity landscape. The rural character of this land unit is enjoyed by the neighbouring residential communities, and the productive capacity of this rural land is of lesser importance than its amenity function. The 'rural' landscape more typical of New Zealand is located at the eastern end of Waiheke, and is classed as Landform 5 (Productive Land).

To allow cell phone masts and antennas in Rural 1 as permitted activities would not be in keeping with the amenity values of this land unit, so the submission is not supported.

Submission 33/9, 1115/1

Submission 33/9 seeks amendment as the proposed rules would allow a height limit for masts and antennas to be 11m (8m+3m). The submitter considers this too restrictive. The submitter accepts that this height limit would be acceptable in high amenity areas, but considers a minimum height of 15m be allowed in rural and business land units. The additional height would allow technically achieve a line of sight to avoid blocking by buildings, trees and topography.

In addition, submission 1115/1 also seeks the requirement of exceeding the land unit height limit by 5m for the above mentioned reasons.

Furthermore submission 1115/1 also seeks the addition of the rural 1 land unit in clause 5.6.2(2)(a). link with submission 1114/1.

Considering the scale of the landscape and buildings, a mast of 11m is likely to not be dominant feature, with building height limits of typically 8m. However, to raise the permitted height limit to 15m has the potential to allow for masts that are of a scale that could be dominant features in any of the land units. Similarly, to allow the height limit to be exceeded by 5m may lead to a similar result. Finally, the Rural 1 landscape is also known as 'rural amenity'. This name conveys the visual sensitivity of this landscape, and any change that makes masts permitted in this area will potentially result in adverse effects on the visual amenity values of this land unit. For these reasons, the submission is not supported.

Submission 33/10, 1115/2

Both submissions relate to clause 5.6.2(2)(b) of the plan. The district plan controls relates to cell site antennas attached to existing buildings (excluding masts). The rule allows that where a cell antenna is to be attached to an existing building, it may exceed the maximum height for the land unit or settlement area, or the lowest point of the roof line of the building by a maximum of 2m, whichever is the lesser.

Submission 33/10 states that if the rule was in force then antennas would be limited to below 8m as most buildings on the islands would be below 8m in height. This would mean that a potential maximum height of 10m for all building mounted antennas (8m+2m). Most of the maximum land unit heights in the plan are limited to 8m. The submitter also states that the antennas should be mounted a sufficient height to meet the radio frequency emission standards in Part 28 of the consolidated bylaw.

Submission 1115/2 also states that the antennas and support structures need to be higher than the permissible height of buildings of the land unit in which they are located. This is needed to ensure an effective transmission signal (due to building obstacles, vegetation, topography) and health and safety issues associated with radio frequency standards.

The submission is supported, due to the practical need for antennas to be higher than the buildings to ensure an effective transmission signal. The dominance of antennas on buildings would be controlled by the rule (see submission 33/6 above) limiting the number of antenna that can be attached to a building.

It is recommended that submission 33/10 be accepted and the rule be amended to allow the antenna to exceed the **highest** point of the roof line by a maximum of 2m, rather than the **lowest** point as originally proposed. The new rule would read:

A cell site antenna attached to an existing building may exceed either the maximum height for the land unit or settlement area or the ~~lowest~~ highest point of the roof line of the building by a maximum of 2m, whichever is the lesser.

Submission 1110/2, 1110/3, 1110/4

The comment below also addresses submissions 1110/3 and 1110/4 which addresses clause 5.6.3(1)(b) and 5.6.4(1)(b).

These submissions support the provisions relating to 5.6.2(1)(b), 5.6.3(1)(b) and 5.6.4(1)(b). The recognition of size and shape of metrolight poles the height, building in relation to boundary and yards do not apply. These provisions promote the efficient development, maintenance and operation of this infrastructure within the road reserve.

Metrolight poles are seen as a means of installing the masts associated with a cellular network in a manner that has acceptable effects on amenity values. The metrolight poles have a similar appearance to street lights and for this reason, they fit in well in the built environment. The height of the metrolight pole should be in keeping with the height of the street lights in the immediate area. However, rather than attempting to write a rule seeking to embed this, it is anticipated that as a matter of good practice the submitters would do this.

As streetlights and metrolight poles are often located near boundaries, they will have difficulty complying with yard and recession plane requirements, which are designed for structures that are of more bulk than a tall thin pole.

For these reasons, this submission is supported.

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