

Form 6

**Further submissions in support of, or opposition to, submissions on the
Proposed Hauraki Gulf Islands District Plan 2006**

Clause 8 of the First Schedule to the Resource Management Act 1991

To: The Chief Executive
Auckland City Council
Private Bag 92516
Wellesley Street
Auckland 1141

Attn: Manager, Hauraki Gulf Islands Team

Submission on: Proposed Hauraki Gulf Islands District Plan 2006

Name: Telecom New Zealand Limited

Address: Telecom New Zealand Limited
PO Box 293
WELLINGTON

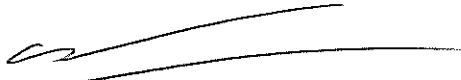
1. The specific submissions to which Telecom's further submissions relate are:

SUBMISSION	SUBMITTER	SUBMITTERS ADDRESS
2928/2 2929/1 2929/2	R A Walden	73 Onetangi Road Onetangi Waiheke Island
941/20	Vector Limited	PO Box 99882 Newmarket Auckland Attention: Rebecca Burt
1108/1 1108/2 1108/3 1109/1	Vodafone NZ Ltd	C/- Harrison Grierson Consultants Ltd PO Box 5760 Wellesley Street Auckland Attention: Poul Israelson

2. The particular parts of the submissions Telecom supports or opposes are:

See attached table

3. Telecom does wish to be heard in support of its submission.
4. If others make a similar submission Telecom would be prepared to consider presenting a joint case with them at any hearing.

Signed:.....

On behalf of Telecom New Zealand
by its authorised agent
Chris Horne, Incite

Dated at Auckland this 7th, day of May 2007

Address for Service:

Telecom New Zealand Limited
C/- Incite
PO Box 3082
Auckland

Other Contact Details:

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Proposed Hauraki Gulf Islands Section of the Auckland City District Plan – Further Submissions of Telecom New Zealand Limited

ID No.	Submitter	Original Submission	Telecom Further Submission	Particular Part	Reasons
2929/1	R A Walden	<i>Seeks that policy 5.3.1(8) be amended to prohibit further overhead lines being put in place in new subdivisions.</i>	Oppose	In its entirety	Prohibited or Non-Complying Activity status is unnecessarily and unreasonably restrictive given the significance of telecommunications in geographically isolated areas with low density populations, and could potentially result in some areas not being able to receive a lines based telecommunications and broadband service. Telecom will generally service new subdivisions with underground lines. However, in a limited number of cases, unusual ground conditions or prohibitive costs may dictate that some overhead deployment is necessary. This would generally require a resource consent in any case, and Telecom would need to justify its position through that process.
2928/2 2929/2	R A Walden	<i>Upgrading of network utility services to be a discretionary activity, with manifest reluctance to underground a notified application.</i> <i>Seeks that the upgrading of overhead lines be a discretionary activity with a presumption of undergrounding.</i>	Oppose	In their entirety (2 submissions)	The rules as notified make some provisions for maintenance of existing lines and provision of overhead customer service connections from existing overhead networks as permitted activities. Telecom supports those provisions already in the proposed plan. In most cases, new overhead lines are already provided for as discretionary activities.

Proposed Hauraki Gulf Islands Section of the Auckland City District Plan – Further Submissions of Telecom New Zealand Limited

ID No.	Submitter	Original Submission	Telecom Further Submission	Particular Part	Reasons
941/20	Vector	<p><i>Policy 5.3.3(7) be amended as follows (or words to similar effect):</i> <i>"By assessing the cumulative visual impact of multiple antennae on the environment"</i></p>	Oppose	Specific reference to "multiple antennae"	The existing policy 5.3.3(7) requires the assessment of the cumulative impacts of overhead utilities in general. Vector is seeking an amendment to the policy so this purely focuses on multiple antennas. Telecom did not oppose the policy as notified, but does not favour this specifically focussing on antennas. All above ground utilities have some form of visual effect, and as such it is not equitable for the potential effects of wireless communications facilities to be singled out from other network utilities.
1108/1 1108/2 1108/3 1109/1	Vodafone	<p><i>Amend clause 5.7.2 to remove the reference to radio frequency fields from the heading and to delete the third bullet point.</i></p> <p><i>Insert a new subsection 5.7.5 as follows:</i> "Radio frequency emissions <i>All network utility services shall comply with NZS 2772.1:1999".</i></p> <p><i>Amend clause 5.8.1 to replace the reference to council's bylaw in criterion P with reference to NZS2772.1:1999.</i></p> <p><i>Amend clause 5.8.1 by adding "where possible" at the start of assessment criterion b.</i></p>	Support	In their entirety (4 submissions)	The telecommunications industry has consistently been opposed to the Auckland City Council's use of a bylaw that sets exposure levels at an arbitrary limit well below New Zealand Standard NZS2772.1:1999, and the Ministry for the Environment and Ministry of Health 2000 Guidelines, which promote use of the levels in NZS2772.1: 1999 as the appropriate limits for use in District Plans.

CITY DEVELOPMENT
21 MAY 2007
AUCKLAND CITY

AUCKLAND CITY COUNCIL
EXECUTIVE
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18 MAY 2007
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INCITE

resource and
environmental
management

S. TAPSELL

17 May 2007

CE	<input type="checkbox"/>	GMOP	<input type="checkbox"/>
GMF	<input type="checkbox"/>	GMACR	<input type="checkbox"/>
GMCD	<input checked="" type="checkbox"/>	MCEO	<input type="checkbox"/>
GMT	<input type="checkbox"/>	<input type="checkbox"/>
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Auckland City Council
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→ City Planning
or appropriate action.

Attn: Manager, Isthmus and Islands Resource Management

Re: Proposed Hauraki Gulf Islands District Plan Section (2006)

Please find attached further submissions by Telecom New Zealand Limited in relation to the Proposed Hauraki Gulf Islands Section of the Auckland City District Plan.

Yours sincerely
Incite

Chris Horne
Director

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File: A50135.00

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