

**FURTHER SUBMISSIONS IN SUPPORT AND OPPOSITION  
OF SUBMISSIONS ON A PUBLICLY NOTIFIED PROPOSED  
DISTRICT PLAN**

***Under Clause 8 of The First Schedule  
To The Resource Management Act 1991***

**To** Auckland City Council (the "Council")  
**Name of submitter** Vodafone New Zealand Limited ("Vodafone")

This is a further submission on the Proposed Hauraki Gulf Islands Section of the Auckland City District Plan.

1. The further submissions are contained on the attached sheets.  
The total number of sheets including this cover sheet is 4.
2. Vodafone wish to be heard in support of the further submissions
3. If others make a similar submission, Vodafone would be prepared to consider presenting a joint case with them at any hearing.

**Signature**



.....  
(Signature of person making further submission or person authorised to sign  
on behalf of person making further submission)

**Date** 22 May 2007

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**AUCKLAND**

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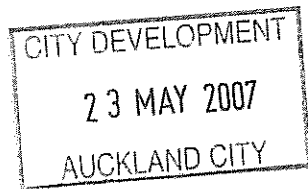
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Submitter Name	Submission Number	Oppose/Support	Submission	Reason
Vector Ltd	941/12	Oppose	Adopt current wording of Policy 5.3.1 (1) - (8).	Vodafone oppose the submission because it is inconsistent with Vodafone's primary submission that sought to amend Policy 5.3.1.6 to provide added flexibility in situations where using the Code of Practise is not the most appropriate environmental means. It is therefore considered that retaining the policy in its current form is not the most appropriate environmental response.
Vector Ltd	941/20	Oppose	Amend Policy 5.3.3 (7) as follows:  <i>"By assessing the cumulative visual impact of overhead utilities multiple antennae on the environment."</i>	Vodafone oppose the submission because it takes an inequitable and discriminatory approach to assessing the potential cumulative effects of network utilities. All above ground network utilities have the potential to generate adverse cumulative effects when not established in appropriate locations. Vodafone consider that singling out telecommunications antenna will not act to avoid, remedy or mitigate any potential cumulative effects generated by aboveground network utilities, and is therefore not considered to be consistent with the purpose and principles of the Act.
Gulf District Plan Association Inc	1147/2	Oppose	Delete clause 5.5.2 (Notification requirements for restricted discretionary activities).	Vodafone oppose the submission because it considers Clause 5.5.2 provides an appropriate degree of certainty when rolling out telecommunications networks, whilst achieving sustainable environmental outcomes.
Telecom NZ Ltd	33/7	Support in part	Amend row 21 of Activity Table 5.5.1 to make activities not meeting one or more development standards a Restricted Discretionary Activity.	Vodafone support the submission in part because it is considered to be the most appropriate activity status for activities that infringe one or more development standards. Providing the Council with discretion to assess aspects of proposed activities that comply with the relevant development standards is not considered to be a necessary environmental response or function for local authorities in achieving the purposes and principles of the Act.

Auckland City Council	2106/5	Oppose	<p>Amend row 10 of Activity Table 5.5.1 as follows:</p> <p><i>"Up to two antennas attached to a building (excluding existing pole structures)"</i></p>	<p>The submission is opposed because it is inconsistent with Vodafone's primary submission that sought to amend the rule from two antenna to five antenna. The submission is seeking to retain the reference to two antennas, which (for the reasons identified in Vodafone's primary submission) does not enable Vodafone to provide effective and efficient coverage to the surrounding area.</p> <p>Furthermore, it is considered that such a provision will result in the proliferation of telecommunications facilities on buildings (needed to provide the required coverage), which conflicts with the intention and purpose of Policy 5.3.3 (7). It is therefore considered that the submissions intention of retaining the number of antennas will not result in the sustainable management of the Gulf Islands, and conflicts with the guiding policies of the network utilities chapter.</p>
Auckland City Council	2106/6	Oppose	<p>Amend row 19 of Activity Table 5.5.1 as follows:</p> <p><i>"Three or more antennas attached to a building (excluding existing pole structures)"</i></p>	<p>The submission is opposed because it is inconsistent with Vodafone's primary submission that sought to amend the rule from three antenna to six antenna. The submission is seeking to retain the reference to three antennas, which (for the reasons identified in Vodafone's primary submission) does not enable Vodafone to provide effective and efficient coverage to the surrounding area.</p> <p>Furthermore, it is considered that such a provision will result in the proliferation of telecommunications facilities on buildings (needed to provide the required coverage), which conflicts with the intention and purpose of Policy 5.3.3 (7). It is therefore considered that the submissions intention of retaining the number of antennas will not result in the sustainable management of the Gulf Islands, and conflicts with the guiding policies of the network utilities chapter.</p>

Gulf District Plan Association Inc	1156/1	Oppose	Delete clauses 5.6.2 - 5.6.4 and replace with community mandated policies and rules.	<p>Vodafone oppose this submission because it does not provide any details on replacement rules, or an indication of the direction the replacement rules will take. It is therefore considered that the submission does not take any active steps to promote the statutory progression of the proposed district plan, or develop replacement rules that will achieve a more effective sustainable management of the Gulf Islands.</p> <p>It is also noted that Network Utilities provisions in District Plans require a balanced approach that enables both an effective and efficient service to be provided to the community and any potential adverse environmental effects to be avoided, remedied or mitigated. It is considered that while community initiated rules may act to avoid, remedy or mitigate adverse environmental effects they may not recognise the technical and specialist requirements of network utilities. Thus, network utility providers may not be able to provide effective and efficient services needed to enable people and their communities to provide for their social, economic, and cultural well-being.</p>
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22 May 2007

Auckland City Council  
Private Bag 92516  
Wellesley Street  
**AUCKLAND**

Attention The Manager - City Planning

Dear Sir / Madam

**Hauraki Gulf Islands Further Submissions – Vodafone New Zealand Limited**  
**HG Ref 1020-124006-01**

Please find attached further submissions prepared on behalf of Vodafone New Zealand Limited on the Proposed Hauraki Gulf Islands Section of the Auckland City District Plan.

If you have any queries, please contact the undersigned.

Yours sincerely  
**Harrison Grierson Consultants Limited**

Poul Israelson  
Principal

enc Further submissions on Proposed Hauraki Gulf Islands Section of the  
Auckland City District Plan

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