
Submission on Napier City Proposed District Plan

Form 5 Submission on publically notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To: Napier City Council - Planning Unit

Date received: 26/10/2023

Submission Reference Number #:21

This is a submission on the following proposed plan (the **proposal**): Napier City Proposed District Plan

Submitter:

Ray Taylor

Address for service:

Ray Taylor
Taylor Communications Ltd
175a Georges Drive Marewa Napier 4110
New Zealand

Email: ray.taylor@getgecko.nz

I wish to be heard: No

I am willing to present a joint case: No

Could you gain an advantage in trade competition in making this submission?

- No

Are you directly affected by an effect of the subject matter of the submission that

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition

- No

Submission points

Point 21.1

Section: NU - Network utilities

Sub-section: NU - Network Utilities - Rules Table

Provision:

NU-R6A

NU-R6B

Activity Status: Permitted

Activity Status where activity conditions 1 or 2 are not met: Restricted Discretionary

Where:

Matters of discretion are restricted to:

1. The activity complies with relevant standards ([NU-S1 - NU-S7](#) and [NU-S9 - NU-S11](#));
2. All electrical power, telecommunications, and information cabling are installed underground, except where located within an industrial zone, or on lots greater than 2 ha in the rural zones, and
3. The activity complies with standard [NU-S12](#) (Radio Frequency Fields) and standard [NU-S13](#) (Electric and Magnetic Fields).

1. The relevant matters of discretion for the standard infringed;
2. Where more than one standard will be infringed, the cumulative [effects](#) of all infringements considered together;
3. Whether alternative locations, routes or other options are physically or technically practicable, and
4. The matters set out in policies [NU-P1](#), [NU-P2](#), and [NU-P3](#).

Notification: Any application under this rule is precluded from being publicly notified.

Activity Status where activity condition 3 is not met: Non-complying

Sentiment: Oppose

Submission:

NU-R6A part 2

All electrical power, telecommunications, and information cabling are installed underground, except where located within an industrial zone, or on lots greater than 2 ha in the rural zones,

The above rule appears to block the installation of above-ground poles and lines along public roadsides where a telecommunications company would like to invest in new infrastructure for under-served areas on the fringes of Napier city. The wording referencing lots of 2 ha in rural zones makes the very difficult to understand specifically in relation to roads.

Relief sought

I would ask that the existing Network Utilities rules be carried forward unchanged.

The new underground-only rules make any project economically non-viable and would discourage investment in communications infrastructure for areas of lower population density such as meeanee village and other surrounding rural areas.

If someone within council was trying to encourage underground-only construction for appearance reasons, I would suggest that maybe the underground-only rule could still apply to the specific Estuary, Foreshore Reserve, Reserve and/or River Conservation Zones which the current operative Network Utilities section does currently place restrictions upon.

The current operative Network Utilities section of the district plan has been serving our city well and I believe will continue to do

so. It encourages infrastructure investment for areas of low population density while the new proposed rules appear to place significant blocks to making any network project viable.