

BEFORE QUEENSTOWN LAKES DISTRICT COUNCIL

IN THE MATTER of the Resource Management Act
1991 (Act)

AND

IN THE MATTER of Stage 3/3b of the Proposed
Queenstown Lakes District Plan

Summary of Planning Evidence by Chris Horne on behalf of Spark New Zealand Trading Limited (Spark) and Vodafone New Zealand Limited (Vodafone).

1. I have prepared planning evidence on behalf of Spark and Vodafone dated 29 May 2020. My relevant qualifications and experience are set out in paragraphs 1 – 5 of that statement.
2. My evidence relates to the heights of poles and attached antennas to be provided for in new zones added to the district plan as part of the Stage 3/3b process.

Reason for submissions

3. Chapter 30 of the Proposed Plan includes rules for Energy and Utilities that apply district wide. The rules for utilities in Chapter 30 override the zone provisions in the Proposed Plan and are essentially a self-contained code for network utility activities. Rule 30.5.6.6 provides for poles (and attached antennas) to various height limits in specified zones. Any zones not specifically listed have a default height limit of 11m.
4. The Stage 3/3b provisions as notified introduce new zones without making any variations to Chapter 30 in regard to the height of poles and attached antennas. Accordingly, any new facilities in these zones will default to a permitted height limit of 11m. The submissions sought to redress this to provide more reasonable zone-specific height limits in Rule 30.5.6.6 commensurate to the sensitivity of each zone and to provide more consistency with how telecommunications poles and antennas are generally provided for

in these zone types in other district plans (examples provided in the evidence of Mr McCarrison/Mr Clune).

Recommended Approach

5. The controls I recommend in my evidence and the response of the reporting planners in the s42A reports and subsequent rebuttal evidence is as follows:

Zone	Recommended Standards	Reporting officer position
General Industrial	Height: 18m Height in relation to boundary controls from residential zone boundaries.	Height 13m (s42A report) Height in relation to boundary controls from residential zone boundaries (rebuttal)
Three Parks Commercial	Height: 18m single operator/21m multiple operator. Height in relation to boundary controls from residential zone boundaries.	Height 16m (s42A report)
Cardrona Settlement	Height: 15m single operator/18m multiple operator (Commercial Precinct only – 11m outside Precinct) Height in relation to boundary controls from Commercial Precinct interface to balance of zone) 1.2m headframe diameter 16% reflectivity control (equivalent to ONLs) 3m road setback.	Height: 15m for single or multiple operator – Commercial Precinct only (rebuttal) Other controls as recommended in Chris Horne's evidence in column to left (rebuttal)

6. In my evidence I set out my opinion that it is necessary to consider the objectives and policies of Chapter 30 Utilities and Energy as well as those relevant to any particular zone to ensure there is an appropriate balance struck between the need for network utilities in a modern society and the benefits these bring to communities, and mitigating the effects of utilities. In my opinion the height limits sought in the submissions with some additional controls I recommend in my evidence are an appropriate balance in the specific zones in question.

7. I acknowledge that the rebuttal evidence of Ms Bowbyes has adopted a number of my recommended standards for the Cardona Settlement Zone with the only exception being a height bonus for multiple operators. This is a significant improvement to the 11m default provisions in the notified provisions. I would comment that a 15m limit may well disincentive co-location for more than one operator on the same facility, and accordingly I still support a 3m height bonus for multiple operator on the same pole, noting that the 1.2m diameter control will ensure any facility retains a slim line profile.

8. Mr Place and Mr Roberts retain the recommended heights of 13m for the General Industrial Zone and 16m for the Three Parks Commercial Zone respectively from their s42A reports, with reliance on the resource consent process to consider any departure for these height limits within these zones on a case by case basis. In my experience permitted height limits in these zone typologies are typically in the 20m – 25m range. In my opinion they place too much focus on the general building height limits in these zones and minimum clearances above adjacent buildings as enabled in these zones, and do not take into account other technical considerations as set out by Mr Holding in regard to wider area coverage and down tilt of antennas to control coverage and reduce interference between sites.

9. I continue to support the permitted activity controls for each of these zones as set in in my evidence.

Chris Horne

11 August 2020

