

**PROPOSED WELLINGTON CITY DISTRICT PLAN:
HEARING STREAM 9 INFRASTRUCTURE
Chris Horne Summary Statement for Telcos**

1. My evidence only covered a limited number of points arising from Mr Anderson's s42A Report which have all been addressed in Mr Anderson's rebuttal evidence. My brief comments on these are as follows:
2. **Definition of *Regionally Significant Infrastructure***. Mr Anderson has confirmed this is deferred to the Wrap-Up Hearing – noted.
3. **Earthworks above Piped Awa (SASM)**. Mr Anderson has confirmed that in his view this would be a permitted activity on the basis any work above piped awa would meet the permitted standards in s42A report version of Rules INF-OL52 (Maintenance and upgrading of existing underground infrastructure) and INF-OL53 (new underground infrastructure). This allows for earthworks subject to various standards including where within ground previously disturbed by infrastructure (which would apply above a piped awa) or is located in a formed road corridor. I am satisfied that the version of these rules attached to Mr Anderson's rebuttal evidence addresses this submission point.
4. **Cabinets in roads in Heritage Overlay**. Mr Anderson agrees it is appropriate to provide for a permitted envelope of utility cabinets in roads in the Heritage Overlay. I agree with his proposed amendments set out in paragraphs 29 and 30 of his rebuttal evidence.
5. **Trenchless underground network utility installation in riparian margins**. Mr Anderson agrees in principle that trenchless methods to install underground Infrastructure in riparian margins should be a permitted activity (para 36 rebuttal evidence). His caveat to this is receiving further internal specialist comments which had not been received at the time of releasing his rebuttal evidence, and he invited the submitter to provide additional information on methods that may be employed. Mr Kantor from Chorus has provided a schematic and some photos of installation of Chorus fibre by trenchless methods which I have attached.

6. **Policies for infrastructure in Outstanding Natural Features and Landscapes (ONFL) outside the Coastal Environment.** In my evidence I set out how in my opinion the policy framework needs to provide some flexibility for infrastructure in these overlays in appropriate circumstances, which aligns with RPS Policy 26 which seeks to protect such areas from inappropriate subdivision, use and development¹. I note Policy INF-P6 already sets out a number of considerations for infrastructure to demonstrate it is appropriate in the circumstances including assessment against anticipated outcomes for the receiving environment. I have a concern that reference to “*protect*” in Policies INF-NFL P38 and P42 (as renumbered in Mr Anderson’s rebuttal evidence) is too stringent a policy test for all development including regionally significant infrastructure in light of RPS Policy 26. The policy includes explanatory text that the intent is not to prevent change in ONFLs, but rather to ensure that change is carefully considered and is appropriate to the landscape values identified in Policy 25.

7. My initial suggestion in evidence was to cross refer to Policy INF-P6 to ensure that those matters were included in consideration along with the ONFL values. However, Mr Anderson does not favour a cross-referencing approach due to the structure of the infrastructure section. On this basis, I consider that direct edits to the two INF-NFL provisions are needed.

8. Mr Anderson agrees at paragraphs 41 to 42 of his rebuttal evidence that some change to the policies is appropriate to allow operators to justify why there is a functional and operational need to be located in the area, and to address effects resulting from the work on the values and attributes that have been identified. In my view a policy framework that that requires robust consideration of why a project may need to occur in a sensitive ONFL area, and where justified for functional and operational requirements that the work remedies or mitigates adverse effects on the values and attributes of the area to the extent practicable is appropriate. I provided examples of this approach in Appendix A to my evidence.

¹ See Para 35 Chris Horne EIC

Directional drilling of fibre cables





