

BEFORE HUTT CITY COUNCIL

IN THE MATTER OF

the Resource Management Act 1991

AND

IN THE MATTER OF

Hutt City Council's Proposed District Plan:
Hearing Stream 6 –Infrastructure

SPEAKING NOTES – TOM ANDERSON

ON BEHALF OF

**CHORUS NEW ZEALAND LIMITED, CONNEXA LIMITED, FORTYSOUTH GROUP
LP AND SPARK NEW ZEALAND TRADING LIMITED**

21 September 2026

SPEAKING NOTES

1. My name is Tom Anderson. I am a Principal Planner and a Director of Incite, a resource management consulting firm. My qualifications and experience are set out in my evidence in chief dated 4 September 2026.
2. As stated in my evidence in chief, that statement was written in the knowledge that an updated to the NESTF was imminent. The aspects of the NESTF to be updated were made publicly available on 10 September (and can be viewed [here](#)) via the NZ Gazette (link to notice [here](#)). The updated NESTF comes into force on 8 October 2026.
3. The amendments to the NESTF are, from what I have been able to discern, generally as per the May 2026 document year titled *National Environmental Standards for Electricity Transmission Activities and National Environmental Standards for Telecommunication Facilities: Report on Recommendations and Decisions* and an *Addendum to recommendations and decisions for National Environmental Standards for Telecommunication Facilities* that I refer to in my evidence in chief as ‘the Ministers Decision’.
4. On review of the NESTF updates and Mr McDonald’s addendum received this afternoon, I have reflected on what relief needs to be provided in the PDP in order to give effect to the NESTF updates and to ensure there is no ‘double up’ between what the NESTF is regulating and what the PDP is.
5. Based on Mr McDonald’s addendum, I agree that the definitions of *aboveground mounted equipment* and *mount* can be removed, and I agree with his recommended wording to INF-R14 (as well as all other rules where he has added the word *:not regulated by the NESENA or NESTF*).
6. Further, regarding Submission Point 311.59 on Standard INF-S2, I suggested at Paragraph 51 of my evidence in chief that upgrading of any infrastructure should occur within 10m of the existing alignment or location. I am no longer seeking this. The updated NESTF provides for all telecommunication upgrades (or replacement of street poles for new poles including antenna) and has a variety of replacement location distances, being:
 - 5m within a new ‘rural setback’;
 - 10m on private sites in the city centre, metropolitan centre, open space and recreation, special purpose and town centre zones;

- 10m for support structures for above ground lines; and
 - No distance for replacing existing poles in legal road with new poles with antenna).
7. Given this, the telecommunication companies will not need to use INF-S2 and therefore the relief at Paragraph 55 is no longer being pursued.

INF-S9

8. I agree with Mr McDonald on his addendum amendments to INF-S9. However, I also continue to seek that the panel antenna sizes in INF-S9.1 reflect what is in the updated NESTF. INF-S9.1 will be used for antenna on new poles outside of road reserve in those zones which the NESTF does not regulate (as listed in Paragraph 17 of my evidence in chief). Antenna size is not adjusted to fit regulation – it is determined by the technology an antenna requires. The effect of an additional 300mm of width, when required, in those zones is not significant in my experience, and will ensure that antenna on poles in private sites have the same effect as antenna on legal road or antenna attached to buildings in those zones.
9. In considering the dish antenna sizes in INF-S9.2, the 1.2m diameter as provided for in the s42A Amendments is sufficient in all zones except the mixed use, commercial, large format retail, special purpose and rural zones. In these zones, for facilities regulated by the NESTF, 2.0m is the permitted dish antenna diameter. I suggest that for consistency that these zones be adjusted in the PDP as well.
10. The headframe sizes in INF-S9.4 of the PDP are more generous than what is provided in the updated NESTF. I had suggested aligning these in my evidence in chief, but this is not essential as if a headframe is proposed under the NESTF that exceeds the permitted regulation of that document, but it is permitted under the PDP, it becomes a controlled activity in the first instance. I do however suggest removing the brackets (*except where located in a road*) from INF-S9.4.a so that there is a permitted standard for any headframe in road in a residential zone which does not meet the NESTF permitted regulations.
11. On the basis of the above, my final relief sought to INF-S9 is as follows:

Amend INF-S9 as follows:

INF-S9 Size – Antennas ~~and aboveground mounted equipment~~

1. A panel antenna:
 - a. Must not exceed a front face width of 0.71.0m, and
 - b. When in a road reserve, must fit within an envelope of 3.55.0m in length and 0.71.2m in width if not on a headframe, or not exceed a front face width of 0.7m if on a headframe.
2. A dish antenna must not exceed a diameter of 1.2m, except for dish antenna located on poles outside of road reserve in a Mixed Use Zone, Commercial Zone, Large Format Retail Zone, Special Purpose Zones, Industrial Zones and Rural Zones, where the diameter must not exceed 2.0m.
3. Omni directional 'whip' or dipole antenna must not exceed:
 - a. 1.6m in vertical length,
 - b. 60mm in diameter, and
 - c. 1.5m in horizontal length.
4. A headframe must not exceed:
 - a. 2.5m in diameter in Residential Zones (except when located in a road), or
 - b. 6m in diameter in all other zones.
- ~~5. In residential zones, aboveground mounted equipment associated with antennas must be located within the antenna mounts.~~
- ~~6. Aboveground mounted equipment must not exceed 1m in length.~~
- ~~7. The area when measured in plan view of aboveground mounted equipment not associated with antennas must not exceed:~~
 - ~~a. 0.5m² if unenclosed, and~~
 - ~~b. 1.0m² if enclosed in a three-dimensional casing.~~

Remaining Matter in Contention

12. Consequently, notwithstanding the additional amendments sought to INF-S9 above, the only matter which remains in contention is Submission Point 311.79 concerning amendments to PINF-P1.
13. I continue to seek the relief sought at Paragraph 70 of my evidence in chief for this submission point.
14. On this matter, I wish to draw the panel's attention to Policy 8 of the Wellington Regional Policy Statement. This policy is titled *Protecting Regionally Significant Infrastructure – Regional and District Plans* and states that:
- District and regional plans shall include policies and rules that protect regionally significant infrastructure from incompatible new subdivision, use and development occurring under, over, or adjacent to the infrastructure.*
15. As explained in my evidence in chief, development adjacent to mobile phone facilities of over height buildings can adversely affect the efficiency of the facility.
16. I note that the RPS explanation to Policy 8 states that *incompatible subdivisions, land uses or activities are those which adversely affect the efficient operation of infrastructure, its ability to give full effect to any consent or other authorisation, restrict its ability to be maintained, or restrict the ability to upgrade where the effects of the upgrade are the same or similar in character, intensity, and scale. It may also include new land uses that are sensitive to activities associated with infrastructure.*
- Protecting regionally significant infrastructure does not mean that all land uses or activities under, over, or adjacent are prevented. The Wellington Regional Council and city and district councils will need to ensure that activities provided for in a district or regional plan are compatible with the efficient operation, maintenance, and upgrading (where effects are the same or similar in character, intensity, and scale) of the infrastructure and any effects that may be associated with that infrastructure. Competing considerations need to be weighed on a case by case basis to determine what is appropriate in the circumstances.*
17. In my view, what I was seeking to achieve through Submission Point 311.79, and in response to the S42A recommendations, the implementation of that submission point through the relief sought at Paragraph 70 of my evidence in chief, is the alignment between the RPS and the protection it affords the telecommunication companies, and the PDP.

A handwritten signature in blue ink, appearing to read 'Tom Anderson', with a stylized, flowing script.

Tom Anderson

21 September 2026