



APPLICATION FORM FOR A RESOURCE CONSENT

PLEASE FILL IN ALL THE FIELDS

Application details

I/We

(must be the FULL name(s) of an individual or an entity registered with the New Zealand Companies Office. Family Trust names and unofficial trading names are not acceptable: in those situations, use the trustee(s) and director(s) names instead) hereby apply for:

☒ Land Use Consent ☐ Subdivision Consent

I opt out of the fast-track consent process: ☐ Yes ☐ No

(only applies to controlled activities under the district plan, where an electronic address for service is provided)

Brief description of the proposed activity:

To upgrade an existing 2degrees telecommunication facility located in road reserve land opposite 12A Silverton Street, Andersons Bay, Dunedin (2degrees site code: OTG-071-024).

Have you applied for a Building Consent? ☐ Yes, Building Consent Number ABA ☒ No

Site location/description

I am/We are the: (☐ owner, ☒ occupier, ☐ lessee, ☐ prospective purchaser etc) of the site (tick one)

Street address of site:

Legal description:

Certificate of Title:

Contact details

Name: (☐ applicant ☒ agent (tick one))

Address:

Phone (daytime): de:
Email:

Chosen contact method (this will be the first point of contact for all communications for this application)

I wish the following to be used as the address for service (tick one): ☒ Email ☐ Post ☐ Other:

Ownership of the site

Who is the current owner of the site?

If the applicant is not the site owner, please provide the site owner's contact details:

Address:
 Postcode:

Phone (daytime): Email:

Planning Application Fees Payment Details (Who are we invoicing)

THIS FORM MUST BE COMPLETED FOR ALL PLANNING APPLICATIONS THAT ATTRACT A FEE. ALL FIELDS ARE MANDATORY.

This information is required to assist us to process resource consent invoices and refunds at lodgement and the end of the process. If you have any queries about completing this form, please email planning@dcc.govt.nz

Deposit Payment Payee Details:

Full Name of Deposit Payee (Person or Company): Two Degrees Networks Limited, C/- SLR Consulting New Zealand

Mailing Address of Deposit Payee (please provide PO Box number where available): 201 Victoria Street West, Auckland 1010

Email Address of Deposit Payee

Daytime contact phone number:

Important Note: The Payee will automatically be invoiced for the deposit and/or any additional costs. Should a portion of the deposit be unspent, it will be refunded to the payee.

Fees

Council recovers all actual and reasonable costs of processing your application. Most applications require a deposit and costs above this deposit will be recovered. A current fees schedule is available on www.dunedin.govt.nz or from Planning staff. Planning staff also have information on the actual cost of applications that have been processed. This can also be viewed on the Council website.

Development contributions

Your application may also be required to pay development contributions under the Council's Development Contributions Policy. For more information please ring 477 4000 and ask to speak to the Development Contributions Officer, or email development.contributions@dcc.govt.nz.

Occupation of the site

Please list the full name and address of each occupier of the site:

N/A - Road reserve.

Monitoring of your Resource Consent

To assist with setting a date for monitoring, please estimate the date of completion of the work for which Resource Consent is required. Your Resource Consent may be monitored for compliance with any conditions at the completion of the work. (If you do not specify an estimated time for completion, your Resource Consent, if granted, may be monitored three years from the decision date).

maximum 2 weeks

(month and year)

Monitoring is an additional cost over and above consent processing. You may be charged at the time of the consent being issued or at the time monitoring occurs. Please refer to City Planning's Schedule of Fees for the current monitoring fee.

Detailed description of proposed activity

Please describe the proposed activity for the site, giving as much detail as possible. Where relevant, discuss the bulk and location of buildings, parking provision, traffic movements, manoeuvring, noise generation, signage, hours of operation, number of people on-site, number of visitors etc. Please provide proposed site plans and elevations.

The upgrade involves the establishment of a 14.5m high telecommunication facility with a group of replacement 3G/4G antennas and new 5G antennas attached on a 1.05m-wide headframe on top of the pole, resulting in a total height of 18.0m, the replacement of existing equipment cabinets with two new cabinets, and the installation of installing of ancillary equipment attached to the replacement pole to support the proposed facility. Further details in the AEE.

Description of site and existing activity

Please describe the existing site, its size, location, orientation and slope. Describe the current usage and type of activity being carried out on the site. Where relevant, discuss the bulk and location of buildings, parking provision, traffic movements, manoeuvring, noise generation, signage, hours of operation, number of people on-site, number of visitors etc. Please also provide plans of the existing site and buildings. Photographs may help.

Road reserve land contains existing utility structures managed by multiple network operators. Details in the AEE.

(Attach separate sheets if necessary)

District plan zoning

What is the District Plan zoning of the site? Road Reserve - underlying zone General Residential 2

Are there any overlaying District Plan requirements that apply to the site e.g. in a Landscape Management Area, in a Townscape or Heritage Precinct, Scheduled Buildings on-site etc? If unsure, please check with City Planning staff.

N/A

Breaches of district plan rules

Please detail the rules that will be breached by the proposed activity on the site (if any). Also detail the degree of those breaches. In most circumstances, the only rules you need to consider are the rules from the zone in which your proposal is located. However, you need to remember to consider not just the Zone rules but also the Special Provisions rules that apply to the activity. If unsure, please check with City Planning staff or the Council website.

Resource consent is sought under the National Environmental Standards for Telecommunication Facilities 2016 (NESTF) and Rule 5.3.2.16

Affected persons' approvals

I/We have obtained the written approval of the following people/organisations and they have signed the plans of the proposal:

Name: No written approval is provided.

Address:

Name:

Address:

Please note: You must submit the completed written approval form(s), and any plans signed by affected persons, with this application, unless it is a fully notified application in which case affected persons' approvals need not be provided with the application. If a written approval is required, but not obtained from an affected person, it is likely that the application will be fully notified or limited notified.

Assessment of Effects on Environment (AEE)

In this section you need to consider what effects your proposal will have on the environment. You should discuss all actual and potential effects on the environment arising from this proposal. The amount of detail provided must reflect the nature and scale of the development and its likely effect. i.e. small effect equals small assessment.

You can refer to the Council's relevant checklist and brochure on preparing this assessment. If needed there is the Ministry for the Environment's publication "A Guide to Preparing a Basic Assessment of Environmental Effects" available on www.mfe.govt.nz. Schedule 4 of the Resource Management Act 1991(RMA) provides some guidance as to what to include.

Details in the AEE.

(Attach separate sheets if necessary)

The following additional Resource Consents from the Otago Regional Council are required and have been applied for: ☐ Yes ☒ No
☐ Water Permit ☐ Discharge Permit ☐ Coastal Permit ☐ Land Use Consent for certain uses of lake beds and rivers ☐ Not applicable

Assessment of Objectives and Policies

In this Section you need to consider and assess how your application proposal aligns with the relevant objectives and policies in the District Plan relating to your activity. If your proposal is a discretionary or non-complying activity under the District Plan more attention to the assessment will be necessary as the objectives and policies of the District Plan may not always be in support of the proposed activity.

Details in the AEE.

Declaration

I certify that, to the best of my knowledge and belief, the information given in this application is true and correct.

I accept that I have a legal obligation to comply with any conditions imposed on the Resource Consent should this application be approved.

Subject to my/our rights under section 357B and 358 of the RMA to object to any costs, I agree to pay all the fees and charges levied by the Dunedin City Council for processing this application, including a further account if the cost of processing the application exceeds the deposit paid.

Signature of: ☐ Applicant ☒ Agent (tick one):

Jo Li (on behalf of the applicant)

Date: 12 Aug 2025

Privacy – Local Government Official Information and Meetings Act 1987

You should be aware that this document becomes a public record once submitted. Under the above Act, anyone can request to see copies of applications lodged with the Council. The Council is obliged to make available the information requested unless there are grounds under the above Act that justify withholding it. While you may request that it be withheld, the Council will make a decision following consultation with you. If the Council decides to withhold an application, or part of it, that decision can be reviewed by the Office of the Ombudsmen.

Please advise if you consider it necessary to withhold your application, or parts of it, from any persons (including the media) to (tick those that apply):

- ☐ Avoid unreasonably prejudicing your commercial position
- ☐ Protect information you have supplied to Council in confidence
- ☐ Avoid serious offence to tikanga Māori or disclosing location of waahi tapu

What happens when further information is required?

If an application is not in the required form, or does not include adequate information, the Council may reject the application, pursuant to section 88 of the RMA. In addition (section 92 RMA) the Council can request further information from an applicant at any stage through the process where it may help to a better understanding of the nature of the activity, the effects it may have on the environment, or the ways in which adverse effects may be mitigated. The more complete the information provided with the application, the less costly and more quickly a decision will be reached.

Further assistance

Please discuss your proposal with us if you require any further help with preparing your application. The Council does provide pre-application meetings without charge to assist in understanding the issues associated with your proposal and completing your application. This service is there to help you.

Please note that we are able to provide you with planning information but we cannot prepare the application for you. You may need to discuss your application with an independent planning consultant if you need further planning advice.

City Planning Staff can be contacted as follows:

IN WRITING: Dunedin City Council, PO Box 5045, Dunedin 9054

IN PERSON: Customer Services Centre, Ground Floor, Civic Centre, 50 The Octagon

BY PHONE: (03) 477 4000

BY EMAIL: planning@dcc.govt.nz

There is also information on our website at www.dunedin.govt.nz

Information requirements

- ☒ Completed and Signed Application Form
- ☒ Description of Activity and Assessment of Effects
- ☒ Site Plan, Floor Plan and Elevations (where relevant)
- ☐ Written Approvals
- ☒ Payee details
- ☒ Application fee (cash, eftpos, direct credit or credit card (surcharge may apply))
- ☐ Certificate of Title (less than 3 months old) including any relevant restrictions (such as consent notices, covenants, encumbrances, building line restrictions)
- ☐ Forms and plans and any other relevant documentation signed and dated by Affected Persons

In addition, subdivision applications also need the following information:

- ☐ Number of existing lots
- ☐ Number of proposed lots
- ☐ Total area of subdivision
- ☐ The position of all new boundaries

In order to ensure your application is not rejected or delayed through requests for further information, please make sure you have included all of the necessary information. A full list of the information required for resource consent applications is in the Information Requirements Section of the District Plan.

OFFICE USE ONLY

Has the application been completed appropriately (including necessary information)? ☐ Yes ☐ No

Application: ☐ Received ☐ Rejected

Received by: ☐ Counter ☐ Post ☐ Courier ☐ Other:

Comments:

(Include reasons for rejection and/or notes to handling officer)

Planning Officer:

Date:



Resource Consent Application

**Roadside Telecommunication Facility Upgrade,
opposite 12A Silverton Street, Andersons Bay**

Two Degrees Networks Limited

Prepared by:

SLR Consulting New Zealand

SLR Project No.: 810.V16399.00001

Client Reference No.: OTG-071-024 Andersons Bay

12 August 2025

Revision: Issued v1.0

Revision Record

Prepared for:	Two Degrees Networks Limited	
Prepared by:	Jo Li Senior Planning Consultant	
Checked by:	Jennifer Valentine Auckland Planning Manager	
Authorised by:	Jennifer Valentine Auckland Planning Manager	
SLR Project No.:	810.V16399.00001	
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Revision:	Date:	
Draft v0.1	25 July 2025	
Issued v1.0	12 August 2025	

Basis of Report

This report has been prepared by SLR Consulting New Zealand (SLR) with all reasonable skill, care and diligence, and taking account of the timescale and resources allocated to it by agreement with Two Degrees Networks Limited (the Client). Information reported herein is based on the interpretation of data collected, which has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of the Client. No warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from SLR.

SLR disclaims any responsibility to the Client and others in respect of any matters outside the agreed scope of the work.



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Appendix D	Landscape Visual Assessment
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Application details

Consent authority:	Dunedin City Council (DCC)
Applicant:	Two Degrees Networks Limited
Address for service:	SLR Consulting New Zealand 201 Victoria Street West Auckland 1010 Attention: Jo Li
Address for fees:	Two Degrees Networks Limited, C/- SLR Consulting New Zealand 201 Victoria Street West Auckland 1010 [REDACTED]
Site:	Road reserve – Opposite 12A Silverton Street, Andersons Bay, Dunedin
Legal description:	N/A – road reserve
Owner(s):	Dunedin City Council
Site area:	N/A. Road reserve
Plan(s):	2nd Generation Dunedin City District Plan (2GP)
Zone(s):	General Residential 2
Designation(s):	N/A
Overlay(s) or control(s):	Archaeological Alert Layer <u>Note.</u> Not relevant to the proposal. The immediate location of the facility is not within the overlay.
Other notation(s):	N/A
Brief description of the proposed activity:	To upgrade an existing 2degrees telecommunication facility located in road reserve land opposite 12A Silverton Street, Andersons Bay, Dunedin (2degrees site code: OTG-071-024). The upgrade involves the establishment of a 14.5m high telecommunication monopole with a group of replacement 3G/4G antennas and new 5G antennas attached on a 1.05m-wide headframe on top of the pole, resulting in a total height of 18.0m, the replacement of existing equipment cabinets with two new cabinets, and the installation of ancillary equipment attached to the replacement pole to support the proposed facility.
Resource consent(s) required:	<u>National Environmental Standards for Telecommunication Facilities 2016 (NESTF):</u> The proposed facility is a restricted discretionary activity under the NESTF as it does not comply



with regulations 26 and 27 of the NESTF and is a restricted discretionary activity under the 2GP.

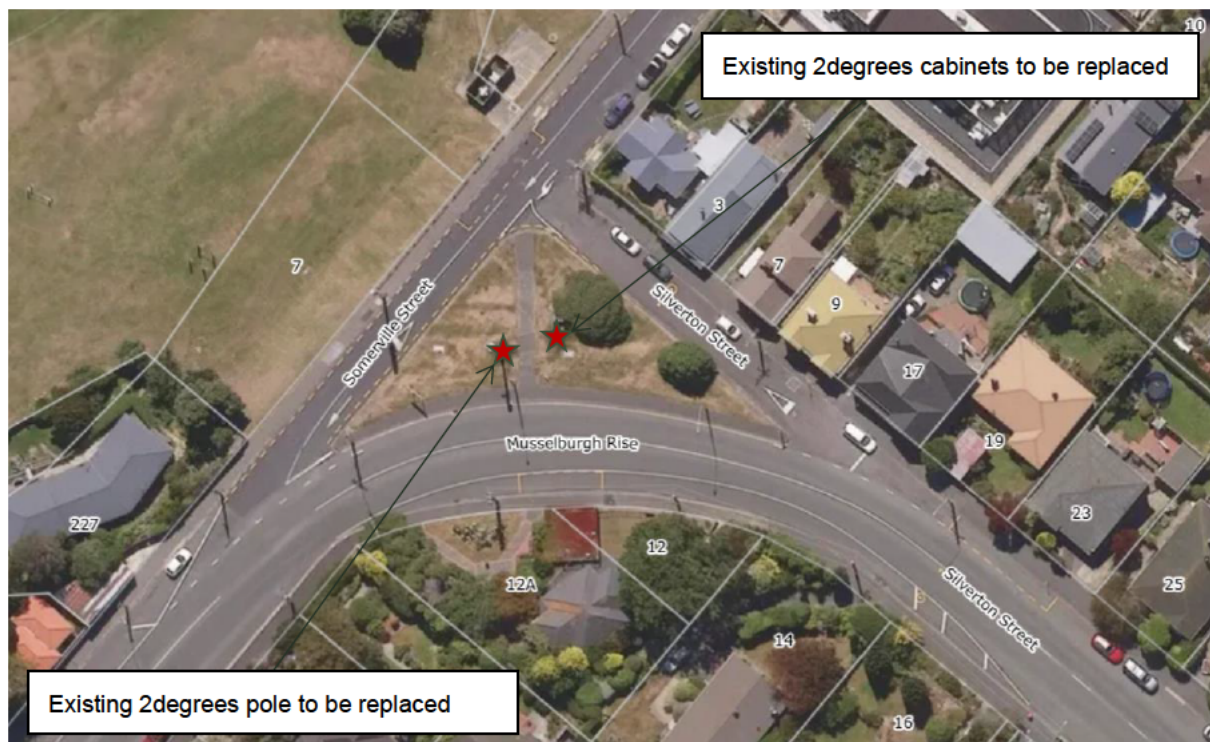
2nd Generation Dunedin City District Plan (2GP):

The proposal is a restricted discretionary activity under the 2GP.

Status of the proposed activity:

Restricted discretionary activity

Figure 1: Locality plan of the site (Source: GRIP Maps).



1.0 Information requirements

This resource consent application has been prepared in accordance with the requirements of Schedule 4 of the Resource Management Act 1991 (the Act or the RMA).

This application seeks all necessary resource consents from the Dunedin City Council ('DCC' or Council) for the proposed upgrades to the existing telecommunication facility under the National Environmental Standards for Telecommunication Facilities 2016 (NESTF) and the 2nd Generation District Plan (2GP). It provides the information necessary for a full understanding of the proposed activity and any actual or potential effects corresponding with the scale and significance of the proposed activity.

2.0 Introduction

Two Degrees Networks Limited ('2degrees') is a leading full-service telecommunications provider, committed to fighting for fair for Kiwis and businesses. 2degrees provides broadband, mobile, and electricity services to more than two million customers. Since its launch, 2degrees has been on a mission to disrupt the market, standing up for fairness and flexibility in an industry that needed change. With mobile and internet coverage spanning 98.5% of the country, and retailers nationwide, 2degrees keeps Kiwis connected wherever they live and work. 2degrees is backed by award-winning customer service, and delivers innovative solutions, allowing customers to choose the connectivity options that suit them best. Through custom-built technology platforms and a commitment to doing things differently, 2degrees empowers Kiwis to stay connected on their own terms.

In June 2022, Connexa acquired 2degrees' passive mobile telecommunications tower assets. 2degrees will continue to own the active elements of its network, including the radio access equipment, spectrum assets, transmission and backhaul, ensuring a world-class network and customer experience.

The world of mobile is changing rapidly, driven by significant advances in technology and increased competition. Consumers have embraced mobile – it is believed more than 70% of Kiwis now own a smartphone and many of those also have three to five other personal mobile devices – tablets, iPads etc. – at their disposal.

With content at their fingertips, this has seen an insatiable demand for high-speed data from their customers who want, and expect to be able to use, their mobile devices whenever and wherever they are. Data usage on the 2degrees network continues to double year on year, with similar growth expected in future.

To meet this demand, 2degrees needs to continue to build and expand its network in order to deliver a high-quality mobile experience to their growing customer base. To address coverage issues within the existing urban networks, 2degrees is deploying new technology to improve service levels and network capacity and coverage.

3.0 Proposal

2degrees is seeking resource consent to upgrade, operate and maintain the existing telecommunication facility located in the road reserve opposite 12A Silverton Street, Andersons Bay. The details of the proposal are shown on the drawings in Appendix A. Figure 2 below provides an indicative photomontage of the proposed facility.

The proposal involves the following key elements:



- To establish a 14.3m high replacement telecommunication pole in a triangular-shaped road reserve close to the junction of Musselburgh Rise, Silverton Street and Somerville Street, opposite 12A Silverton Street. The proposed pole is to replace an existing telecommunication pole in the same road reserve land, approximately 1.5m to the southeast.
- The installation of a group of three 3G/4G antennas on top of the proposed pole at approximately 15.9m from the ground level. Two of the antennas measure 2.099m (h) x 0.499m (w) x 0.206m (d) and the third one measures 2.550m (h) x 0.749m (w) x 0.226m (d) .
- The installation of three 5G antennas, each measuring 0.568m (h) x 0.370m (w) x 0.146m (d), on top of the 3G/4G antennas at approximately 17.6m from the ground level. Two of the antennas measure 2.099m (h) x 0.499m (w) x 0.206m (d) and the third one measures 2.550m (h) x 0.749m (w) x 0.226m (d).
- The proposed antennas will be attached on a new headframe measuring 1.05m in width.
- The total height of the proposed facility, including the pole and antennas but excluding the lightning rod, will be 18.0m from the ground level. The proposed pole and antennas will be finished in a standard grey colour that matches the existing facility to be replaced.
- The installation of new ancillary equipment, including a group of RRHs (Remote Radio Head) to the proposed monopole.
- The existing microwave dish antenna will be removed.
- The installation of two replacement equipment cabinets, each measuring 1.605m (h) x 0.7m (w) x 0.75m (d), on the existing concrete plinth approximately 3.1m set back from the footpath within the road reserve. The existing utility cabinet (0.9m(h) x 1.2m(w) x 0.48m(d)) is to remain. The proposed replacement equipment cabinets will be painted in black bean green to match the existing cabinets to be replaced.
- Nominal earthworks will be required to install the proposed pole and to connect the power and fibre to the existing supply points nearby. No pruning or works in the dripline of the nearby road reserve vegetation is required.

An acoustic report is attached as Appendix B. This confirms that the noise emissions from the proposed cabinets will comply with the relevant requirements of noise limits in regulation 24 of the NESTF.

A radiofrequency (RF) letter prepared by 2degrees' radiofrequency engineer is attached as Appendix C. The report addresses the cumulative effects of radio emissions as required in the Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016 (NESTF) and the New Zealand Radiofrequency Radiation Standard (NZS 2772.1:1999). As specified in the RF letter, a post-commencement report prepared in accordance with regulation 55(4) of the NESTF will be provided to Council within 3 months of the upgrade becoming operational to confirm that compliance with all relevant standards in NESTF can be achieved.

This application is informed by a Landscape and Visual Assessment (LVA) titled 'Proposed 2Degrees Telecommunication Facility Upgrade, Andersons Bay, Dunedin - Landscape Effects Assessment Report' prepared by Mike Moore, dated 23 May 2025, which is attached as Appendix D. This forms part of the application.



Figure 2: Photomontage of the proposed facility (Source: 2degrees)



3.1 Functional and operational need

The proposed upgrade has an operational need to be of the height proposed to ensure compliance with the requirements for radiofrequency field emissions to protect public health and safety.

The existing buildings located within 234 Musselburgh Rise and 12A Silverton Street are on elevated land compared to the road reserve land where the proposed facility is to be located, which means the existing buildings are up to a height that is closer to the main beam of the antennas. Therefore, the proposed antennas in the vicinity need to be located on a higher position to achieve electromagnetic emissions (EME) compliance with the relevant standards in the NESTF, i.e., to ensure that potential radiofrequency field levels will not reach 25% of the maximum level authorised by NZS 2772.1 within the area that are reasonably accessible to the general public. The presence of the recently upgraded 16.0m high One NZ facility further compounds the issue of EME compliance meaning that the 2degrees antenna need to be at a higher level to ensure there is not an overall increase in EME. If the total height of the proposed 2degrees facility were to be reduced, it would increase the overall EME in this area, and 2degrees would need to limit the site's coverage and capacity, as well as undertake EME measurements and testing. Ultimately it would mean another facility would need to be built in the area to ensure an appropriate level of service in this location.

In terms of the antenna over 700mm in diameter this size is necessary to provide the appropriate level of coverage over the residential area including the upper slopes of the hill suburbs without providing a cross over of coverage between the antennas.



Taking into account the above-mentioned factors, there are operational needs for the proposed height of the facility at 18.0m from the ground to ensure the overall EME compliance and the facility can be operated properly.

3.2 Permitted activities that form part of the proposal

Detailed assessments of the proposal against the NESTF and the 2GP are provided in Appendices D and E. The permitted activities that form part of the proposal are summarised below:

3.2.1 National Environmental Standards for Telecommunications Facilities 2016

- The proposed cabinets will meet the height and footprint standards in regulation 20.
- The proposed cabinets will meet the relevant noise standards in regulation 24(4) of the NESTF as confirmed in the Acoustic Assessment attached in Appendix B.
- The proposed pole will comply with the location and pole width standards in regulation 27.
- The minor earthworks associated with the installation of the proposed facility will meet the relevant standards in regulation 54.
- The proposed facility will meet the relevant radiofrequency standards under NZS2772.1 and regulation 55 of the NESTF, as confirmed in the Radiofrequency Report attached in Appendix C.

3.2.2 Dunedin City 2nd Generation District Plan

- Pursuant to Rule 5.3.2.10, small scale network utility structures in residential zones are a permitted activity, subject to compliance with all relevant performance standards. In this instance:
 - The proposed cabinets, as a small-scale network utility, comply with all relevant rules in the 2GP.

4.0 Background

4.1 Consent history

The existing telecommunication monopole was originally established via a Certificate of Compliance (Council reference: COC-2011-20) issued on 30th August 2011.

Resource consent LUC-2020-585 was granted on 3rd December 2020 to upgrade the existing facility by installing two additional cabinets that were located within 30m of the One.NZ cabinets.

In 2024, 2degrees obtained a resource consent (Council reference: LUC-2024-367, granted on 7th October 2024) authorising the installation of a replacement microwave dish antenna that is of a larger size of 413mm in diameter.

None of the above-mentioned consents contains conditions that would prevent the proposed upgrade in this application. The existing telecommunication facility is therefore lawfully established.



Copies of the existing resource consent decisions are contained in Appendix G.

4.2 Consultation

4.2.1 Telecommunication Act Notice

In accordance with the requirements of the Telecommunications Act 2001, a telecommunications notice has been served to the roading authority, Dunedin City Council, on 29th April 2025. A copy of the correspondence is attached as Appendix H.

4.2.2 Advice to adjacent neighbours

The proposed facility involves a taller pole to be erected in road reserve land adjacent to residentially zoned land. 2degrees sent letters on 30 June 2025 to residential properties within a 130m radius of the site, advising of the proposed upgrade and that a resource consent will be sought for the proposed upgrade. For those properties that were identified in the LVA a different letter was sent inviting feedback on the proposal. At the time the report is written, no response has been received.

A sample letter is attached in Appendix I of this application.

4.2.3 Pre-application consultation with Dunedin City Council

Informal pre-application advice was sought from the Resource Consent department at DCC on 13 February 2025. The duty planner at the DCC advised via email that a LVA report is deemed necessary to support the application due to the height infringement. A copy of the pre-application correspondence with DCC is attached in Appendix J of this application.

5.0 Site and surrounding environment

The immediate location of the existing 2degrees telecommunication facility is in a triangle-shaped road reserve, measuring approximately 710m² in area, close to the corner of Silverton Street, Somerville Street and Musselburgh Rise, and opposite 12A Silverton Street.

The existing 2degrees facility comprises a telecommunication monopole with one dish antenna attached to the pole at approximately 9.0m from the ground level and a group of panel antennas enclosed by a shroud on top of the pole. A group of 2degrees cabinets is located within the same road reserve land, approximately 8m from the pole, within 3m of another group of cabinets and utility structures operated by One.NZ (Figure 3). Across Somerville Street, there is an existing 16m-high One.NZ telecommunication facility, approximately 18m from the 2degrees facility (Figure 4).

There are rows of power poles with overhead lines running along both directions of Musselburgh Rise and extending along the western side of Somerville Street. In addition, there is a row of streetlight poles running along Musselburgh Rise in the road reserve on the same side as the existing 2degrees facility is located. The surrounding urban environment consists of single and two-storey dwellings with mature planting. Local Plunket Rooms located directly opposite the facility at 12A Silverton Street, behind an existing concrete bus shelter. The recreation land of Bayfield Park is located to the north-west of the facility location adjacent to Andersons Bay Inlet. Expansive views are available from the road corridor and open space areas across to the coastal environment.



Musselburgh Rise is classified as an Urban High Density Corridor under the 2GP with one lane of traffic in each direction; while both Silverton Street and Somerville Street are classified as Collector roads (refer to Figure 5). The existing 2degrees and One.NZ telecommunication facilities are in the same cluster, together with other vertical infrastructure, including power lines and streetlights, which contribute to a common urban feature containing utility structures in the road reserve.

The site is in the General Residential 2 under the 2nd Generation Dunedin City District Plan (2GP) (Figure 5). The site is within a residential environment in an urban area, with adjacent land to the east and south under the same General Residential 2 zone, while the land adjacent to the northwest is in the General Residential 1 zone. The site further to the northwest is the Recreation zoning of Bayfield Park, which extends to Andersons Bay Inlet. The north corner of the road reserve land is subject to the Archaeological Alert Layer, however, the location of the 2degrees facility is not subject to any planning limitations.

Figure 3: The existing network utilities in the road reserve land, viewed from road reserve land of Somerville Street (Source: Site visit photos taken in April 2025).

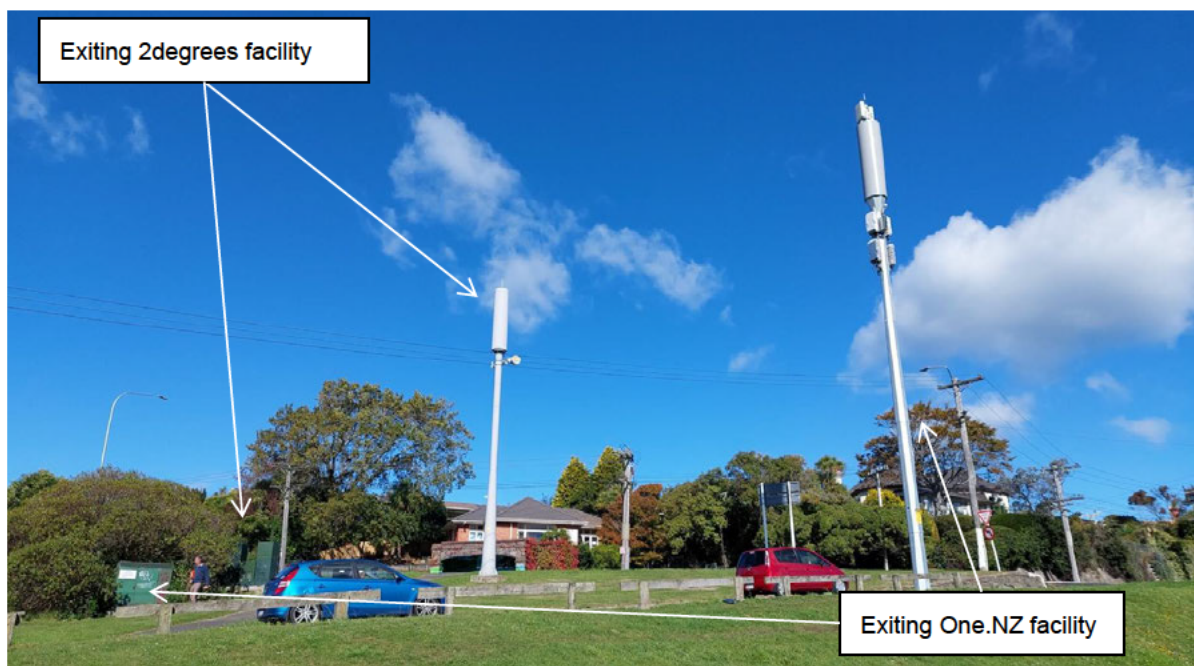
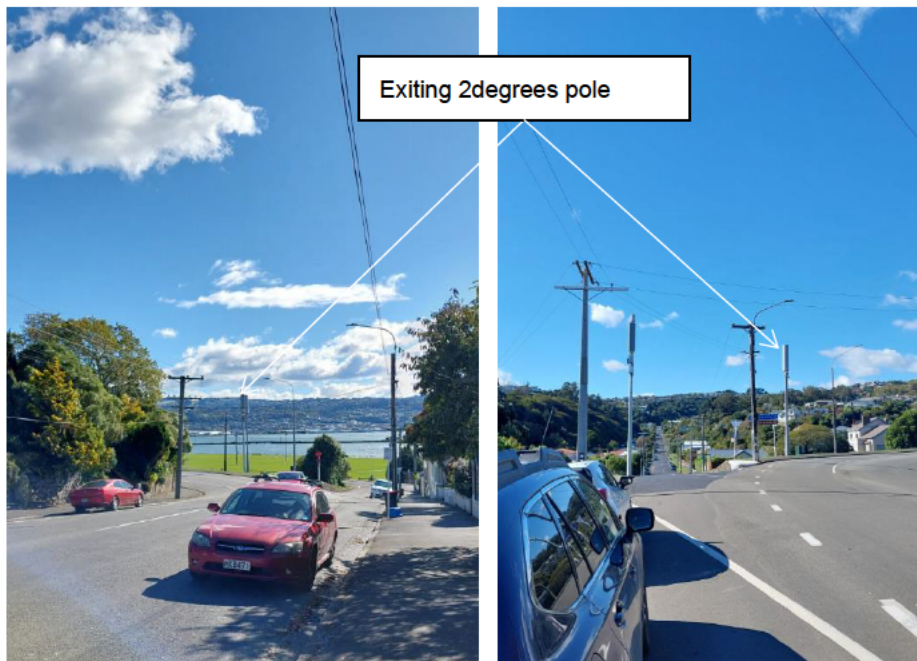


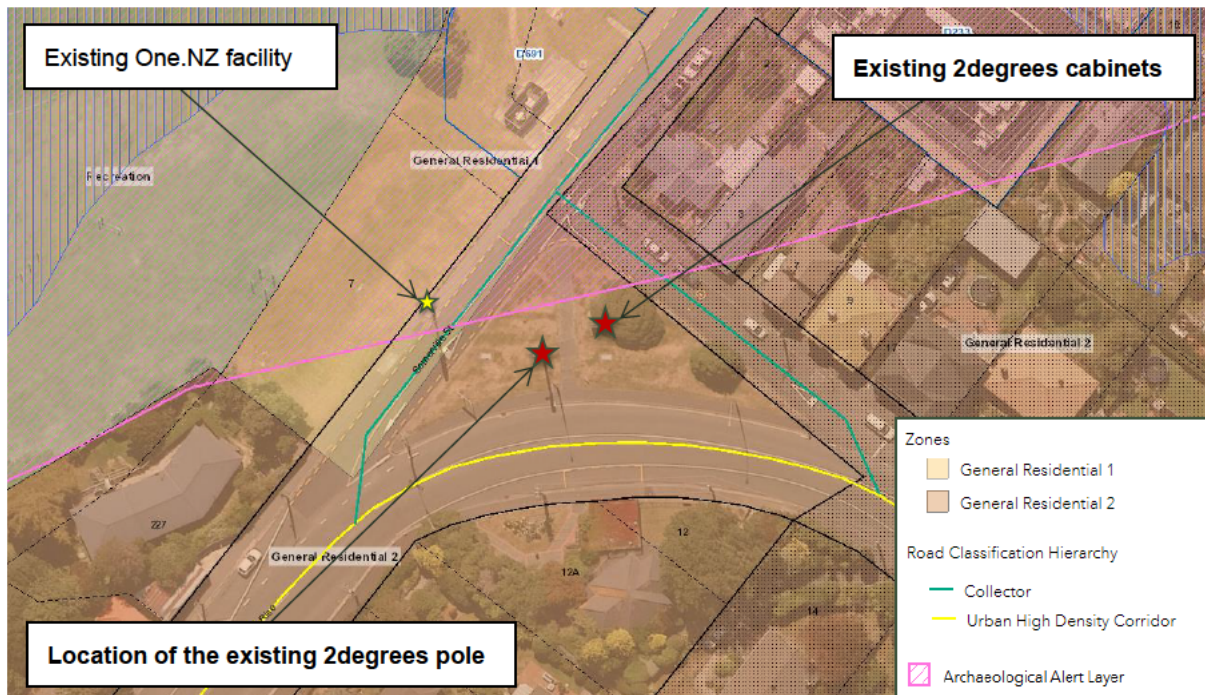
Figure 4: Streetview of the existing facility and surrounding environment (Source: Site visit photos taken in April 2025).



(a) Viewed from Silverton Street

(b) Viewed from Musselburgh Rise

Figure 5: The zoning map of the site and surrounding environment (Source: 2GP Planning Map).



6.0 Reasons for the application

An assessment of the proposal against the relevant statutory documents has been undertaken and the following reasons for consent have been identified. A detailed rules assessment is provided in Appendices E and F.

6.1 National Environmental Standards for Telecommunication Facilities

The proposal requires resource consent under the NESTF for the following reasons:

- Pursuant to regulation 15 of the NESTF, the installation, operation and maintenance of the proposed telecommunications facility is a **restricted discretionary activity** as it is a restricted discretionary activity under the 2GP, notably:
 - There is an existing One.NZ cabinet within 30m and on the same side of the road reserve. The proposed replacement cabinets will not comply with group rules for cabinets in regulation 22.
 - One of the proposed 3G/4G antennas exceeds 0.7m in width and will not comply with the standard in regulation 27(3).
 - The height of the upgraded facility will not comply with the standard in regulation 27(5).
 - The upgraded facility does not meet the headframe rules in regulation 27(7).

6.2 Dunedin City 2nd Generation Plan

The proposal requires resource consent under the 2GP for the following reason:

Chapter 5 Network Utilities

- Pursuant to Rule 5.3.2.16.a, any large scale network utility structure located in residential zones is a **restricted discretionary activity**.
 - The proposed headframe does not comply with the scale threshold of small scale network structure in Rule 5.5.3.6 of the 2GP¹ and therefore, are assessed as large scale network utility structure and requires a restricted discretionary activity consent.
 - One of the proposed 3G/4G antenna, measuring 2.55 m(h) x 0.749 m(w) x 0.226 m(d), does not comply with the scale threshold of small scale network structure in Rule 5.5.3.6(c) of the 2GP, and therefore are assessed as large scale network utility structure and requires a restricted discretionary activity consent.
 - According to the Rule 5.5.3.6A, the maximum height of new poles/mast in the General Residential 2 Zone is 14m in height. The proposed facility will be 18m in height, exceeding the maximum allowable height by 4m and therefore are assessed as large scale network utility structure and requires a restricted discretionary activity consent.

¹ Refer to assessment in Appendix F for details.



6.3 Overall activity status

Overall, resource consent is required for a **restricted discretionary activity**.

6.3.1 Sections 87A and 104C (Restricted discretionary activities)

As a restricted discretionary activity, the consent authority may grant or refuse resource consent only in relation to the matters it has restricted its discretion over. The matters that discretion has been restricted to are:

6.3.1.1 National Environmental Standards for Telecommunication Facilities

Under regulation 15(2) of the NESTF:

For the purposes of section 87A(3)(a) of the Act, discretion is restricted over the subject matter of each regulation (or component of a regulation)—

- (a) compliance with which is part of the standard; and*
- (b) that is not complied with.*

6.3.1.2 Dunedin City 2nd Generation District Plan

Section 5.8.2 of the 2GP outlines a number of matters of discretion that the Council will be restricted to when assessing restricted discretionary utility activities, as follows:

5.8.2 Assessment of restricted discretionary network utility activities

1. *All restricted discretionary network utility activities*
 - a. *Benefits of network utility activities;*
 - b. *Functional needs and operational needs of network utility activities*
 - c. *Effects on character and amenity of zone*
 - d. *Effects on surrounding sites' residential amenity*

Conditions of consent can only be imposed in relation to these matters.

7.0 Assessment of effects on the environment

7.1 Introduction

Having reviewed the relevant plan provisions and site visit photos and taking into account the matters that must be addressed by an assessment of effects on the environment as outlined in clause 7 of Schedule 4 of the Act, the effects that warrant consideration as part of this application are listed below.

As this application is for a **restricted discretionary activity**, the relevant effects are restricted to the matters that consent authority has restricted discretion over, as outlined in Section 6.3.1 of this report.

An assessment of these effects, that corresponds with the scale and significance of the effects that the proposed activity may have on the environment, is provided below. Clause 7(2) notes that the requirement to address matters in the assessment of effects on the environment is subject to the provisions of any policy statement or plan. The relevant documents are also assessed in this report.



7.1.1 Permitted baseline

The “permitted baseline” is relevant to the assessments under sections 95A to 95G and 104 of the Act. Under these sections, the consent authority may disregard an adverse effect on the environment if a national environmental standard or the plan permits an activity with that effect. This is the permitted baseline. It is only the adverse effects over and above those forming a part of the baseline that are relevant when considering an application.

The purpose of the permitted baseline test is to isolate, and make irrelevant, the effects of activities on the environment that are permitted by the plan. When applying the baseline, such effects cannot then be taken into account when assessing the effects of a particular resource consent application. The baseline has been defined by case law as comprising the “existing environment” and non-fanciful (i.e., credible) activities that would be permitted as of right by the plan and/or national environmental standard in question.

In this case, the permitted baseline relevant to this application is in the NESTF. The NESTF provides a permitted activity pathway for the installation and operation of antennas on an existing/replacement pole in the road reserve up to a maximum of 12.74m height and a width of 0.70m, without a headframe, i.e., all antennas contained within a notional envelope of not more than 0.7m in diameter.

The proposed facility (including the pole and antennas) will be 18m in height and comprises a 1.05m wide headframe with an antenna that is greater than 0.7m in width.

The proposed cabinets meet the size, bulk and noise emission requirements but do not meet the group rules under the NESTF. The proposed cabinets meet all relevant permitted activity standards under the 2GP.

As noted in Section 3.1 of this report, the proposed facility complies with the requirements in the NESTF relating to associated earthworks and radiofrequency regulations. These form part of the permitted baseline thresholds of this application. As such, no further considerations of these matters are required in the below assessment.

Therefore, taking into account the restricted discretionary activity status of the application, it is the effects beyond that provided for by the permitted baseline under the NESTF that are relevant to the assessment below, being:

- The additional pole height of 5.26m;
- The 0.049m additional width in one of the proposed antennas; and
- The 0.25m additional diameter of the notional envelope for all proposed antennas to fit in which results in a headframe;
- The installation of cabinets in proximity of another group of cabinets in the road reserve.

7.1.2 Receiving environment

In assessing the potential effects on the environment, the “receiving environment” for effects must be considered.

The receiving environment is a mandatory consideration that is defined by case law, and it is the environment beyond the site upon which a proposed activity might have effects. This includes the future state of the environment upon which effects will occur, including:

- the environment as it might be modified by the utilisation of rights to carry out permitted activities; and



- the environment as it might be modified by implementing resource consents that have been granted at the time a particular application is considered, where it appears likely that those resource consents will be implemented.

In this case, the receiving environment is as described in Section 5.0 of this report. In particular, it is noted the 16m-high One.NZ pole in the road reserve across the carriageway of Somerville Street has completed an upgrade which increased the height of the facility.

7.1.3 Other considerations

Sections 95D(d) to 95D(e) and 104(3)(a) of the Act require that assessments must disregard:

- trade competition, or the effects of trade competition; and
- any effect on a person who has given written approval to this application.

Trade competition and written approval are not relevant to this application.

7.2 Effects on residential character and amenity

Due to the proposed additional height of the pole and the introduction of a new headframe, as well as the cabinets, the proposal has the potential to result in adverse effects on the residential character and amenity of the surrounding environment, in particular, with respect to visual amenity.

As described in Section 3.1, the proposal has an operational need to be of the height proposed. This height is necessary due to the proximity of the One.NZ facility and the need to ensure compliance with electromagnetic emissions. The proposed larger antenna is necessary to provide effective coverage across this residential area.

The proposed pole, antennas and headframe on top of the pole will be in a standard grey colour to reduce potential reflectivity and dominance and is typical colouring of network utility infrastructure.

The assessment below is informed by the landscape and visual effects assessment (LVA) report located in Appendix D.

7.2.1 Effects on the character and amenity of the residential zone

The facility within road reserve land is located at the junction of three public roads adjacent a large area of open space. The roads provide a key connection through Andersons Bay and to the outlying hill suburbs, while Bayfield Park is a flat area of recreation land used for sports that extends to the adjacent coastal marine area of the Harbour.

While the upgraded facility is visible from surrounding public roads and the wider environment, the facility will be viewed in conjunction with other existing utilities in the road reserve particularly the existing 16m-high One.NZ monopole as well as streetlights, power poles with overhead lines, and signage. These existing vertical elements contribute to a visually complex streetscape and have been part of the existing environment amidst the backdrop of a well-established residential suburb. The slimline design of the pole and the standard grey colour of the antennas and headframe will ensure that any potential dominance effects are minimised and properly managed. This design also ensures that there will be no adverse effect on sunlight admission to the public road or Bayfield Park.

The presence of the existing infrastructure and the existing 2degrees facility, reduces the effect of visual change that occurs as a result of the increased height and visual bulk of the



proposed facility. Overall Mr Moore concludes that the proposal will have a physical effect on the landscape character of the area that while adverse will be low-moderate.

When viewed from the direction of the publicly accessible recreational area of Bayfield Park and Andersons Bay Inlet, and areas further north and west, Mr Moore provided assessments from three viewpoints (Viewpoints 5, 6 and 8). From the Park's upper terrace which offers a relatively closer (being 45m from the proposed facility) and slightly elevated perspective, it is acknowledged that the upgraded 18m monopole will be more prominent than the existing 12m high structure. However, given the slimline form of the upgraded facility and recessive colour seen against the sky, Mr Moore concludes that the upgraded facility is expected to be visually balanced when viewed in the context with all nearby infrastructure such as the One NZ facility and power poles. From Viewpoint 6b from the inlet edge of the Park at a greater distance, the upgraded facility will be less prominent when viewed against the backdrop of an established suburban cityscape. Although the upgraded facility will extend into the skyline, the upgraded facility as a whole remains a slimline utility structure that is commonly seen in urban environments, largely due to the slimline form and recessive colour, as well as the greater distance will soften any additional visual dominance caused by the additional height and bulk. In terms of the view from further north on Marne Street, which is running across Bayfield Park and Andersons Bay Inlet, the replacement facility will be blended into other built environments, including various vertical utility structures and within a backdrop of the existing cityscape of an established residential suburban area. Also, given the proposed facility is a slimline structure finished in recessive colour and will not intrude on the skyline, it is not expected that the upgraded facility will be immediately noticeable when viewed from Marne Street. Overall, Mr Moore concludes that the proposed upgrade will have low-moderate visual effects on these locations.

When considering the location, presence of the existing infrastructure and slimline design despite the additional bulk and height of the facility it is considered that there will be at most a minor adverse effect on the residential character and amenity of the surrounding area.

In regard the proposed cabinets, given they are replacing existing cabinets in the same location it is not considered there will be any adverse effect on the character and amenity of the residential zone from this aspect of the upgrade.

7.2.2 Effects on surrounding sites' residential amenity

In terms of surrounding properties, a comparative visibility analysis between the existing and upgraded facility based on drone simulations have been carried out by Mr Moore within approximately 130m radius of the proposed location.

From the simulation exercise, Mr Moore considered properties located at 7, 9 12A, 17, 18, 23 and 34 Silverton Street, 243 Musselburgh Rise and 10 Cranston Street will have significant glazing facing the existing and upgraded facility (refer to pages 12-13 of the LVA in Appendix D). In particular, Mr Moore notes that the upgraded 18m-high facility will present as a new visual element from at least one of the windows in properties located at 34 Silverton Street and 10 Cranston Street. With regard to the property at 12A Silverton Street that is directly opposite the site, Mr Moore notes that the property is used for Plunket Clinic and considers the potential effects on residential amenity values will be lesser. For other identified properties,

Mr Moore considers that the degree of additional adverse effect will be similar to that assessed from public viewpoints at a similar proximity. As such Mr Moore considers that the adverse visual effects on the persons identified will be low-moderate. In particular, this is because of the obvious visual increase in height and scale of the facility and its visibility.



I also make the following assessment regarding the persons who own, occupy or visit these properties:

- In regard 7, 9 12A, 17, 18 and 23 Silverton Street and 243 Musselburgh Rise taking into account the conclusions reached in the LVA, despite the presence of other infrastructure in the area and the slimline design, due to the visibility of the increased height and scale of the facility I consider that the proposal will have minor adverse effects on these persons.
- 10 Cranston Street: The LVA rated the effects as Low-Moderate because the upgraded facility will present as a new visual element when viewed from these properties. However, a new element or visible change people's eyesight does not mean they will be affected to a minor or more than minor degree. In this instance, 10 Cranston Street is separated from the site by a group of properties on Silverton Street (refer to Figure 6), and the adjoining property to the northwest (2 Cranston Street) is an existing substation. Therefore, it is expected that this property has a lower level of appreciation of amenity compared to others. Even if the upgraded facility will appear as a new visual element when viewed from a certain angle from the property, it is not anticipated that the pole will be a dominating feature to owners/occupants at this property. When taking into account the separation distance, the slimline design and recessive colour to be used, and the exist level of amenity, I consider any adverse effects on people at this property will be less than minor.
- 2 and 3 Silverton Street: The LVA does not specify the visual amenity effects on these properties. These two properties are directly adjacent to the site. 2 Silverton Street is located on the corner of Silverton Street and Somerville Street, with the main façade face to Somerville Street. The southwestern boundary of this property is screened by a fence and no window is directly facing the location of the proposed facility. The property at 3 Silverston Street is situated on a lower level than the road reserve and there are limited glazing areas facing the proposed facility. In addition, the proposed facility is highly screened by the existing street trees in the road reserve. As such, any adverse effects on people at 2 and 3 Silverston Street will be at most less than minor.
- 28 Silverton Street: The property at 28 Silverton Street is approximately 100m from the site and the northern side of the dwelling are largely screened by the existing vegetation and dwellings to the north (16 Silverton Street). When taking into account the separation distance, the slimline design and recessive colour to be used, it is not expected that the upgraded facility will be within the primary view of the occupants from their principal outlook and it is not anticipated that the pole will be a dominating feature to owners/occupants at this property.
- For all other surrounding properties that are not explicitly assessed in the LVA. given the separation distance, slimline design and recessive colour of the proposed facility along with its location beside the existing One NZ pole, it is expected that the proposed facility will generate adverse effects on visual amenity that will be less than minor. The location of the proposed facility is set back from the road corridor by at least 7.5m and all adjoining residential use sites will be separated from the immediate location of the proposed facility by the road corridors and grassed berm. The proposed facility will be slimline and finished in recessive colours and will be similar to other existing utility structures on the road reserve and will not detract from



the visual amenity of persons, including the road users travelling on roads and visitors in Bayfield Park

7.2.3 Effect of replacement cabinets

In terms of the replacement cabinets, Mr Moore notes in his assessment that due to the replacement equipment cabinets being located at the same location, of the similar footprint in size and will be finished in the same dark green colour as the existing cabinets, it is anticipated that the replacement cabinets will blend well with the shrub backdrop and surrounding environment. As such I consider that the cabinets will have at most less than minor adverse effects on the residential character and amenity, including visual amenity of the surrounding environment.

7.2.4 Summary of effects on residential character and amenity

Overall, when taking into account the conclusions reached in the LVA that the proposal, in particular the proposed pole and antennas on headframe, will have a minor adverse effect on the character and amenity of the residential area and will have a minor adverse visual effect on the owners and occupiers of 7, 9 12A, 17, 18, 23 and 34 Silverton Road and 234 Musselburgh Rise.

7.3 Benefits of network utility activities (Positive effects)

The proposal will generate positive effects on the environment, being:

- Upgrading the existing facility to accommodate antennas utilising 5G technology; and
- Providing efficient and effective mobile coverage to current and future residents and businesses in the wider Andersons Bay community, as well as visitors in Bayfield Park for recreational purposes and the road users travelling along the surrounding road network for daily commuting purposes.

7.4 Conclusion

Overall, based on the preceding assessments and taking into account the proposed slimline design and proposed finished colour to match the existing facility, the proposal will have minor adverse effects on the residential character and amenity of the environment as well as positive effects due to improved coverage.

8.0 Statutory assessment

Section 104(1) of the Act requires that, when considering a resource consent application, the consent authority must have regard to the matters set out in subsections (1)(a), (ab), (b) and (c). These matters are addressed below, and all are subject to Part 2.

8.1 Section 104(1)(a) (Actual and potential effects)

Section 104(1)(a) requires the consent authority to have regard to “any actual and potential effects on the environment of allowing the activity”.

As assessed in Section 7.0 of this report, the proposal will minor adverse effects, in particular in terms of visual effects, as well as will generate positive effects of improving the existing telecommunication facilities for the local area.



Overall, based on the preceding assessment and taking into account the mitigation measures proposed, any actual and potential effects are considered to be acceptable.

8.2 Section 104(1)(ab) (Offsetting or compensation)

Section 104(1)(ab) requires that the consent authority to consider “any measure proposed or agreed to by the applicant for the purpose of ensuring positive effects on the environment to offset or compensate for any adverse effects on the environment that will or may result from allowing the activity”.

In this case, the proposed activity is not of a scale or nature that would require specific offsetting or environmental compensation measures to ensure positive effects on the environment.

8.3 Section 104(1)(b) (Statutory documents)

Section 104(1)(b) requires the consent authority to have regard to any relevant provisions of the following:

- a national environmental standard;
- other regulations;
- a national policy statement;
- a New Zealand coastal policy statement;
- a regional policy statement or proposed regional policy statement; and
- a plan or proposed plan.

An assessment of the relevant statutory documents that corresponds with the scale and significance of the effects that the proposed activity may have on the environment is provided below.

8.3.1 National Environmental Standards for Telecommunication Facilities

The NESTF sets environmental standards to manage and protect our natural resources by providing benchmarks for the planning and operation of telecommunications facilities with regard to radiofrequency fields, installation of equipment cabinets, erection or replacement of poles and antennas, and associated noise generation.

The assessment against the relevant provisions of the NESTF confirms compliance with the relevant regulations except for the location of the grouped cabinets, pole height, and the use of a headframe. The foregoing assessment has determined that the proposed facility will result in minor adverse effects on the environment, in particular, effects on residential character and amenity. This assessment, combined with the fact that the facility complies with the radiofrequency requirements of the NESTF, determines that the proposal is considered to overall meet the overall intent of the NESTF.

8.3.2 Dunedin City 2nd Generation District Plan

8.3.2.1 Relevant Objectives and Policies

The 2GP contains a number of objectives and policies that are considered to be relevant to the proposal across different chapters and sections. In particular, Section 5.8.2 of the 2GP



provides guidance on relevant objectives and policies for assessing restricted discretionary utility activities, as follows: These are listed and assessed below:

Objectives and policies		Assessment comments
5. Network Utilities		
Objective 5.2.1	<i>The benefits of network utility activities, including renewable energy generation activities, are recognised by enabling them to establish, operate and upgrade efficiently and effectively, while:</i> <i>a. achieving the amenity and character objectives for the zone, to the degree practicable; and</i> <i>b. achieving the relevant objectives and policies for any applicable overlay zone, scheduled site, or mapped area, for those areas.</i>	As assessed in Section 7.0, adverse effects on residential amenity and the character of the underlying residential zone will be minor. The location of the proposed facility is in a road reserve separated from residential dwellings. It will be viewed in the same cluster with existing utility structures in the vicinity. The proposed pole and antennas will be in a standard grey colour that reduces potential reflectivity and dominance of the facility. The facility height is necessary to ensure compliance with radiofrequency requirements and is due to the upgrade in technology and presence of the nearby One.NZ facility. For these reasons despite the visibility of the facility the adverse effects on the surrounding residential environment are considered to be acceptable and the proposal is generally consistent with this objective and policy.
Policy 5.2.1.5	<i>Only allow network utility structures - large scale (in all zones), network utility poles and masts - small scale (in residential and recreation zones), and substations (other than in industrial zones) where the activity is designed and located to avoid or, if avoidance is not practicable, adequately mitigate:</i> <i>a. adverse effects on visual amenity and the character of the zone in which the activity is located; and</i> <i>b. adverse effects on the amenity of any surrounding residential activities.</i>	
2. Strategic Directions		
Objective 2.3.1	<i>Land and Facilities Important for Economic Productivity and Social Well-being</i> <i>Land, facilities and infrastructure that are important for economic productivity and social well-being, which include industrial areas, major facilities, key transportation routes, network utilities, and productive rural land:</i> <i>a. are protected from less productive competing uses or incompatible uses, including activities that may give rise to reverse sensitivity; and</i> <i>b. in the case of facilities and infrastructure, are able to be operated, maintained, upgraded and, where appropriate, developed efficiently and effectively.</i>	The proposal is to upgrade an existing telecommunication facility to ensure the ongoing effective and efficient operation of the 2degrees network. As assessed in Section 3.1 above, in this instance, there are functional and operational requirements of the proposed facility to provide effective and efficient coverage of the surrounding area that necessitates its proposed



Objectives and policies		Assessment comments
Policy 2.3.1.7	<i>Enable network utilities through:</i> <i>a. identifying National Grid and Critical Electricity Distribution Infrastructure on the Planning Map and protecting the safe and efficient establishment, operation, maintenance and upgrading of this infrastructure from inappropriate development;</i> <i>b. provisions that provide for network utilities to be established, operated, maintained and upgraded efficiently and effectively, while managing any adverse effects on the environment in accordance with other provisions in this Plan;</i> <i>c. provisions that require the consideration of the functional needs and operational needs of network utilities, in assessing the degree to which an option is practicable;</i> <i>d. provisions that require the consideration of the benefits of network utilities, including but not limited to benefits to economic, social and cultural well-being, and public health and safety, in assessing the effects of a proposed activity; and</i> <i>e. provisions that manage earthworks near all network utilities and activities near to Radio New Zealand infrastructure.</i>	height and continued use of equipment cabinets. In addition, the proposed height means additional facilities in the wider area are not required to ensure the level of required coverage. The proposed facility will benefit and contribute to the social, economic and cultural wellbeing of surrounding residents who will have access to 2degrees network coverage and will also benefit from the improved resilience and security of the mobile network. Overall, the proposal is considered to be consistent with the objective and policy.

In summary, as assessed above, it is considered that the proposal is consistent with the relevant objectives and policies in the 2GP.

8.3.2.2 Assessment Criteria

The following is an assessment against the relevant matters of discretion for this proposal:

a. Benefits of network utility activities;

As described in Section 7.3 the proposal provides for improved coverage and connectivity for residents and others in the Andersons Bay area. The proposal is part of a lifeline utility network that provides connectivity during times of emergency and therefore benefits the public's health and safety. The facility is part of the overall 2degrees network that provides coverage, without this particular multiple other poles in the wider environment would be necessary to provide the same coverage.

b. Functional needs and operational needs of network utility activities

Section 3.1 sets out the functional and operational needs of the network utility. In particular due to the presence of the nearby One NZ facility the proposed height is necessary to ensure compliance with radiofrequency requirements. Enabling this height and the proposed larger antenna reduces the need for additional facilities within the local area to provide effective coverage. Upgrading the existing facility in this location is an efficient use of resource as existing service connections and cabinets are in place, and there is no lessening of network coverage in the immediate area.

c. Effects on character and amenity of zone



The proposed facility is replacing an existing facility in the same location, which is clustered with other infrastructure including a One.NZ facility, streetlight poles and overhead powerlines. As such the character of the immediate area is one of infrastructure. Due to the type of infrastructure, being a telecommunication pole, the use of landscaping to provide screening of the additional height is not possible. The slimline nature of the facility ensures there are not adverse effects on sunlight admission to the footpath, street, or adjacent recreation reserve. Despite the additional height of the facility it is considered to be compatible with the surrounding area due to the presence of existing infrastructure and the separation from residential dwellings provided by the road network. Overall, adverse effects on the character and amenity of the zone are considered to be at most no more than minor and acceptable.

d. Effects on surrounding sites' residential amenity

A detailed assessment supported by an LVA has been undertaken of the potential effects on the amenity of surrounding sites, specifically on the visual amenity of the persons who own or occupy those sites. This is set out in Section 7.2 above. It is concluded that due to the visibility of the proposed facility, despite its slimline and recessive design and being clustered with other infrastructure that there will be adverse effects on these persons that are minor. However, the location proposed is considered the most practicable and appropriate in the area as it is separated from residential properties by the local road network and such telecommunication facilities are typical infrastructure in urban environments. Overall the proposal is considered to have an acceptable level of actual and potential effects on the surrounding residential amenity.

From the assessment above the proposal is considered to be consistent with the relevant metres of discretion.

8.3.3 Conclusion

The above assessments demonstrate that the proposal is consistent with the relevant provisions of the relevant statutory documents.

8.4 Section 104(1)(c) (Other matters)

In addition to the matters of regard covered under subsections (1)(a), (ab) and (b), subsection (1)(c) states that consideration must be given to "any other matters that the consent authority considers relevant and reasonably necessary to determine the application."

There are no other matters relevant to this application.

9.0 Other relevant sections of the Act

9.1 Section 108 (Proposed conditions of consent)

It is requested that draft conditions of consent are shared with SLR in advance of a decision being made on the application.

9.2 Section 35 (Monitoring charges)

Under section 35, the consent authority is required to monitor the exercise of resource consents. Given the limited scale of the proposed activity, and because all mitigation measures are inherent within the application, it is considered that only a limited need for



monitoring exists. The Applicant accepts a reasonable monitoring fee in accordance with the consent authority's monitoring fee system and that the consent authority may carry out its monitoring functions by way of inspections of the site during the development of the proposal.

9.3 Section 125 (Lapsing of consent)

Section 125 prescribes a standard consent period of five years in which all works must be undertaken, but this may be amended as deemed appropriate by the consent authority. It is requested that the standard five-year period be applied in this case.

10.0 Notification assessment

10.1 Public notification assessment

Section 95A of the Act requires the consent authority to follow specific steps to determine whether to publicly notify an application. An assessment of the application against these steps is provided below.

10.1.1 Step 1: Mandatory public notification in certain circumstances

An application must be publicly notified if it meets any of the criteria under section 95A(3):

- (3) (a) the applicant has requested that the application be publicly notified;
- (b) public notification is required under section 95C;
- (c) the application is made jointly with an application to exchange recreation reserve land under section 15AA of the Reserves Act 1977.

The Applicant does not request public notification and the application is not made jointly with an application to exchange recreation reserve land.

Therefore, Step 1 does not apply, and Step 2 must be considered.

10.1.2 Step 2: Public notification precluded in certain circumstances

An application must not be publicly notified if it meets any of the criteria under section 95A(5):

- (5) (a) the application is for a resource consent for 1 or more activities, and each activity is subject to a rule or national environmental standard that precludes public notification;
- (b) the application is for a resource consent for 1 or more of the following, but no other, activities:
 - (i) a controlled activity;
 - (iii) a restricted discretionary, discretionary, or non-complying activity, but only if the activity is a boundary activity;

None of these criteria apply to the application.

Therefore, Step 2 does not apply, and Step 3 must be considered.



An application must be publicly notified if it meets any of the criteria under section 95A(8):

- There is no rule or national environmental standard that requires public notification. However, an assessment of adverse effects on the environment is required.

With respect to section 95D(a), the land adjacent to the application site is mapped in Figure 6 with details listed in Table 1.

Proposed replacement cabinets

Proposed replacement pole

The map displays the intersection of Somerville Street, Silverton Street, and Musselburgh Rise. Several areas are highlighted in yellow, indicating proposed replacement cabinets, and are numbered 1 through 12. A red star marks the location of a proposed replacement pole at the intersection of Somerville Street and Silverton Street. The map also shows surrounding residential properties with their addresses, including 225, 226, 227, 232, 234, 236, 238, 240, 242, 244, 246, 248, 250, 252, 254, 256, 258, 260, 262, 264, 266, 268, 270, 272, 274, 276, 278, 280, 282, 284, 286, 288, 290, 292, 294, 296, 298, 300, 302, 304, 306, 308, 310, 312, 314, 316, 318, 320, 322, 324, 326, 328, 330, 332, 334, 336, 338, 340, 342, 344, 346, 348, 350, 352, 354, 356, 358, 360, 362, 364, 366, 368, 370, 372, 374, 376, 378, 380, 382, 384, 386, 388, 390, 392, 394, 396, 398, 400, 402, 404, 406, 408, 410, 412, 414, 416, 418, 420, 422, 424, 426, 428, 430, 432, 434, 436, 438, 440, 442, 444, 446, 448, 450, 452, 454, 456, 458, 460, 462, 464, 466, 468, 470, 472, 474, 476, 478, 480, 482, 484, 486, 488, 490, 492, 494, 496, 498, 500, 502, 504, 506, 508, 510, 512, 514, 516, 518, 520, 522, 524, 526, 528, 530, 532, 534, 536, 538, 540, 542, 544, 546, 548, 550, 552, 554, 556, 558, 560, 562, 564, 566, 568, 570, 572, 574, 576, 578, 580, 582, 584, 586, 588, 590, 592, 594, 596, 598, 600, 602, 604, 606, 608, 610, 612, 614, 616, 618, 620, 622, 624, 626, 628, 630, 632, 634, 636, 638, 640, 642, 644, 646, 648, 650, 652, 654, 656, 658, 660, 662, 664, 666, 668, 670, 672, 674, 676, 678, 680, 682, 684, 686, 688, 690, 692, 694, 696, 698, 700, 702, 704, 706, 708, 710, 712, 714, 716, 718, 720, 722, 724, 726, 728, 730, 732, 734, 736, 738, 740, 742, 744, 746, 748, 750, 752, 754, 756, 758, 760, 762, 764, 766, 768, 770, 772, 774, 776, 778, 780, 782, 784, 786, 788, 790, 792, 794, 796, 798, 800, 802, 804, 806, 808, 810, 812, 814, 816, 818, 820, 822, 824, 826, 828, 830, 832, 834, 836, 838, 840, 842, 844, 846, 848, 850, 852, 854, 856, 858, 860, 862, 864, 866, 868, 870, 872, 874, 876, 878, 880, 882, 884, 886, 888, 890, 892, 894, 896, 898, 900, 902, 904, 906, 908, 910, 912, 914, 916, 918, 920, 922, 924, 926, 928, 930, 932, 934, 936, 938, 940, 942, 944, 946, 948, 950, 952, 954, 956, 958, 960, 962, 964, 966, 968, 970, 972, 974, 976, 978, 980, 982, 984, 986, 988, 990, 992, 994, 996, 998, 1000.

Table 1: Land adjacent to the subject site.

Address	Legal description	Key
7 Somerville Street, Andersons Bay, (Part of Bayfield Park Recreation Reserve owned by the Dunedin City Council owned)	Lot 37 DEEDS 17	1
12A Silverton Street	Part Lot 35 DEEDS 17	2
12 Silverton Street	Part Lot 36 DEEDS 17	3
9 Silverton Street	Part Lot 4 DP 205	4
7 Silverton Street	Part Section 3 Block II Andersons Bay SD	5
3 Silverton Street	Lot 1-2 DP 304973	6
2 Somerville Street	Part Section 3 Block II Andersons Bay SD	7

10.1.3.2 Step 3 summary

With respect to section 95D, the adjacent land (discussed above), permitted baseline and matters of discretion were considered as part of the assessment of environmental effects undertaken in Section 7.0 of this report.

When excluding adjacent land and positive effects, and taking into account the receiving environment, permitted baseline and the matters of discretion, the overall adverse effects of the proposed activity on the environment will be minor.

Therefore, Step 3 does not apply, and Step 4 must be considered.

10.1.4 Step 4: Public notification in special circumstances

Under section 95A(9), an application must be publicly notified if the consent authority determines that “special circumstances” exist, notwithstanding that Steps 1 to 3 do not require or preclude public notification.

Special circumstances are not defined by the Act. Case law has, however, identified special circumstances as being “outside the common run of things which is exceptional, abnormal or unusual, but less than extraordinary or unique. A special circumstance would be one which makes notification desirable despite the general provisions excluding the need for notification.”² The consent authority should also be satisfied that public notification may elicit additional information on those aspects of the proposal which require resource consent.

However, special circumstances must be more than:

- where the consent authority has had an indication that people want to make submissions;
- the fact that a large development is proposed; or
- the fact that some persons have concerns about the proposal.

² *Far North District Council v Te Runanga-a-iwi o Ngati Kahu* [2013] NZCA 221 at [36] and [37].



No special circumstances exist that require the application being publicly notified as the proposal is for upgrades to an existing telecommunications facility located within the road reserve in an established residential neighbourhood in the urban environment and will provide continuous service to both the surrounding urban communities. This cannot be said to be either exceptional or unusual.

10.1.5 Public notification summary

From the assessment above it is considered that the application does not need to be publicly notified, but an assessment of limited notification is required.

10.2 Limited notification assessment

If the consent authority determines not to publicly notify an application, it must then follow the steps of section 95B of the Act to determine whether to give limited notification of the application. An assessment of the application against these steps is provided below.

10.2.1 Step 1: Certain affected groups and affected persons must be notified

An application must be limited notified to the relevant persons if it meets the criteria under sections 95B(2) to 95B(4):

- (2) (a) affected protected customary rights groups; or
(b) affected customary marine title groups (in the case of an application for a resource consent for an accommodated activity).
- (3) (a) whether the proposed activity is on or adjacent to, or may affect, land that is the subject of a statutory acknowledgement made in accordance with an Act specified in Schedule 11; and
(b) whether the person to whom the statutory acknowledgement is made is an affected person under section 95E.
- (4) Notify the application to each affected group identified under subsection (2) and each affected person identified under subsection (3).

There are no protected customary rights groups or customary marine title groups or statutory acknowledgement areas that are relevant to this application.

Therefore, Step 1 does not apply, and Step 2 must be considered.

10.2.2 Step 2: Limited notification precluded in certain circumstances

An application must not be limited notified to any persons if it meets any of the criteria under section 95B(6):

- (6) (a) the application is for a resource consent for 1 or more activities, and each activity is subject to a rule or national environmental standard that precludes limited notification;
(b) the application is for a controlled activity (but no other activities) that requires a resource consent under a district plan (other than a subdivision of land).

None of these criteria apply to the application.

Therefore, Step 2 does not apply, and Step 3 must be considered.



10.2.3 Step 3: Certain other affected persons must be notified

Other affected persons must be notified in the following circumstances specified by section 95B(7) and (8):

- (7) In the case of a boundary activity, determine in accordance with section 95E whether an owner of an allotment with an infringed boundary is an affected person.
- (8) In the case of any other activity, determine whether a person is an affected person in accordance with section 95E.

The proposal is not for a boundary activity.

In deciding whether a person is an affected person under section 95E, the consent authority under section 95E(2):

- (2) (a) may disregard an adverse effect of an activity on a person if a rule or national environmental standard permits an activity with that effect;
- (b) must disregard an adverse effect that does not relate to a matter for which a rule or environmental standard reserves control or restricts discretion; and
- (c) must have regard to every relevant statutory acknowledgement made in accordance with a statute set out in Schedule 11 of the Act.

The consent authority must not consider that a person is an affected person if they have given their written approval, or it is unreasonable in the circumstances to seek that person's written approval.

With respect to sections 95B(8) and 95E, the assessment of environmental effects undertaken in Section 7.0 of this report demonstrates that the adverse effects on the environment as a whole will be minor and that there will be minor adverse effects on specific persons who own and occupy some of the surrounding properties. These persons are set out in Table 2 below.

Table 2: Address of potential affected parties

Address

7 Silverton Street
9 Silverton Street
12A Silverton Street
14 Silverton Street
17 Silverton Street
18 Silverton Street
23 Silverton Street
234 Musselburgh Rise
34 Silverton Road

No other persons are considered to be affected to a minor or more than minor degree as discussed in Section 7.0.



10.2.3.1 Statutory acknowledgements

With respect to section 95E(2)(c), when deciding who is an affected person, the consent authority must have regard to every relevant statutory acknowledgement made in accordance with an Act that is specified under Schedule 11. Those named in that schedule are affected if the adverse effects are minor or more than minor.

There are no statutory acknowledgements that are relevant to this application.

10.2.3.2 Step 3 summary

As affected persons have been identified, the application must be limited notified to them. In addition, Step 4 must be considered.

10.2.4 Step 4: Further notification in special circumstances

As required by section 95B(10), the consent authority must determine the following:

- (10) Determine whether special circumstances exist in relation to the application that warrant notification of the application to any other persons not already determined to be eligible for limited notification under this section (excluding persons assessed under section 95E as not being affected persons).

The proposal is for upgrades of an existing telecommunication facility within the road reserve. The proposal involves the erection of a replacement pole with antennas on top and the installation of replacement cabinets and ancillary equipment to support the operation of the proposed facility. A consideration of adverse effects on any person has been undertaken under Step 3 where it was concluded that these are less than minor.

Therefore, there are no other persons who should be limited notified.

10.2.5 Limited notification assessment summary

It is recommended that the persons identified in Section 10.2 of this report above are given limited notification of this application.

10.3 Notification assessment conclusion

Pursuant to sections 95A to 95G of the Act, it is recommended that the application is non-notified based on the following reasons:

- Step 1 of section 95A: Public notification is not mandatory.
- Step 2 of section 95A: Public notification is not precluded.
- Step 3 of section 95A: Public notification is not required as the specified circumstances do not apply, including that the adverse effects on the environment will not be more than minor.
- Step 4 of section 95A: No special circumstances exist that require public notification.
- Step 1 of section 95B: There are no certain affected groups or persons who must be limited notified.
- Step 2 of section 95B: Limited notification is not precluded.



- Step 3 of section 95B: Affected persons have been identified and therefore it is recommended those persons be limited notified.
- Step 4 of section 95B: No special circumstances exist that require limited notification to any other persons.

11.0 Part 2 of the Act

Section 5 identifies the purpose of the Act as being the sustainable management of natural and physical resources. This means managing the use of natural and physical resources in a way that enables people and communities to provide for their social, cultural and economic well-being while sustaining those resources for future generations, protecting the life supporting capacity of ecosystems, and avoiding, remedying or mitigating adverse effects on the environment.

Section 6 of the Act sets out several matters of national importance. None of those matters of national importance are considered relevant to this application.

Section 7 identifies a number of "other matters" to be given particular regard to in the consideration of any assessment for resource consent, including:

(c) the maintenance and enhancement of amenity values:

The proposal maintains the amenity values in the area by locating the facility within a road reserve land where three key urban roads meet, in which utility structures are common. While it is acknowledged that the upgraded facility will be a visible change in the neighbourhood, the slimline design and recessive colour will ensure the upgraded facility as a whole will present an activity that is similar to the existing pole to be replaced and other utility structures in this area, such that the overall amenity values will be maintained.

Section 8 requires the consent authority to take into account the principles of the Treaty of Waitangi, and this has also informed our assessment under section 104.

Overall, the application is considered to be consistent with the relevant provisions of Part 2, as expressed through the objectives, policies and rules that we reviewed in earlier sections of this application. Given this consistency, it is concluded that the proposal achieves the purposes of sustainable management set under section 5 of the Act.

12.0 Conclusion

The Applicant seeks resource consent to upgrade, operate and maintain an existing 2degrees telecommunications facility in a road reserve area close to the junction of Silverton Street, Somerville Street and Musselburgh Rise, opposite 12A Silverton Street, Andersons Bay. The proposed upgrade involves the erection of a replacement telecommunication monopole with replacement 3G/4G antennas and new 5G antennas on top of the pole, and the replacement of existing equipment cabinets and ancillary equipment attached to the existing pole. The proposed facility exceeds the maximum allowable pole height rules and has a headframe, as well as one of the proposed antennas infringes the maximum permitted size under the NESTF. It is a restricted discretionary activity under the 2GP and the NESTF.

In terms of section 104(1)(a) of the Act, the actual and potential effects of the proposed activity on the environment will be minor and acceptable as discussed in Sections 7.0 and 8.0 of this report. In particular, the proposal will have minor adverse effects on the character and visual amenity of the surrounding environment.



The proposal will also generate positive effects, through improved network coverage for current and future residents, businesses and road users in the local area.

In terms of section 104(1)(b) of the Act, the proposal, as a restricted discretionary activity, is considered to be consistent with the intent of the NESTF, and the relevant objectives and policies, as well as assessment criteria, of the 2GP for those reasons outlined in Section 8.0 of this report.

It is also considered that the proposal will have minor adverse effects on the wider environment, there are specific persons who are considered affected. No special circumstances exist. As such, it is recommended that the Council limited notify the application to the persons identified in Section 10.2.3.

Overall, in accordance with section 104C in relation to restricted discretionary activities, it is considered appropriate for consent to be granted after limited notification, subject to fair and reasonable conditions.





Appendix A Application Plans

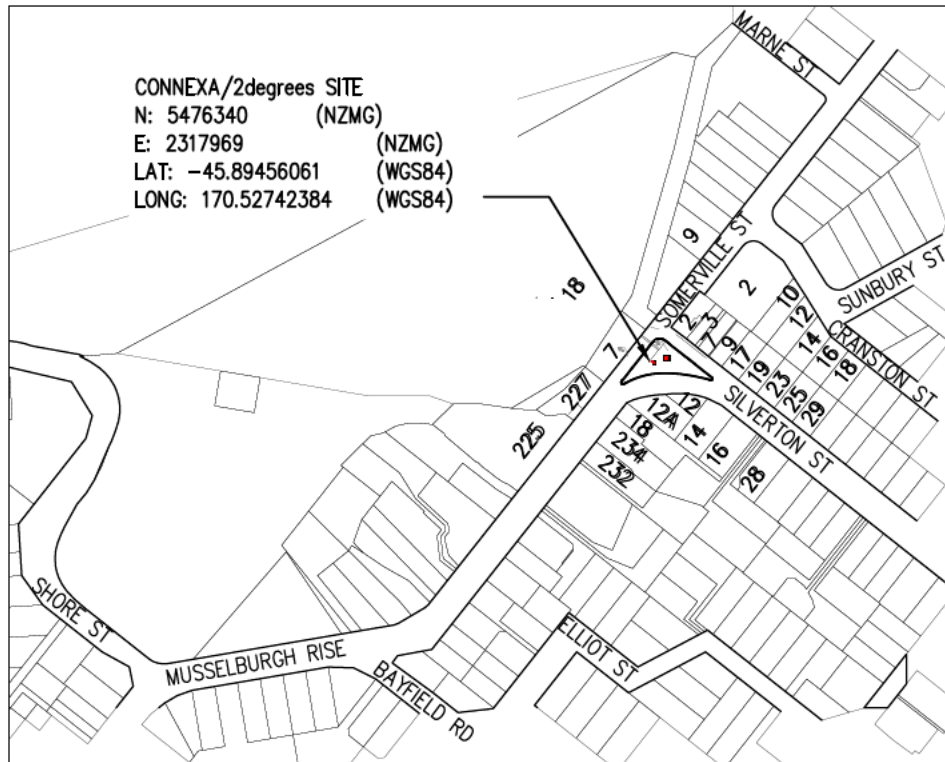
Resource Consent Application

**Roadside Telecommunication Facility Upgrade, opposite 12A Silverton Street,
Andersons Bay**

Two Degrees Networks Limited

SLR Project No.: 810.V16399.00001

12 August 2025



LOCALITY MAP
SCALE 1:5000

LEGEND - EXISTING SERVICES	
— W —	WATER MAIN
— P — P —	POWER
— G —	GAS
— TC —	TELSTRA
— —	POWER (OVERHEAD)
— FO —	FIBRE OPTIC
— SW —	STORMWATER
— SS —	SANITARY SEWER
— T —	TELECOM
— HV — HV —	HIGH VOLTAGE POWER

⊙	STORMWATER MANHOLE	▣	DRAINAGE GRATE
●	SANITARY SEWER MANHOLE	⌵	WATER TOBYBOX

MODIFIED TIER 1
MONOPOLE DEPLOYED

MODIFIED TIER 2
HEADFRAME DEPLOYED

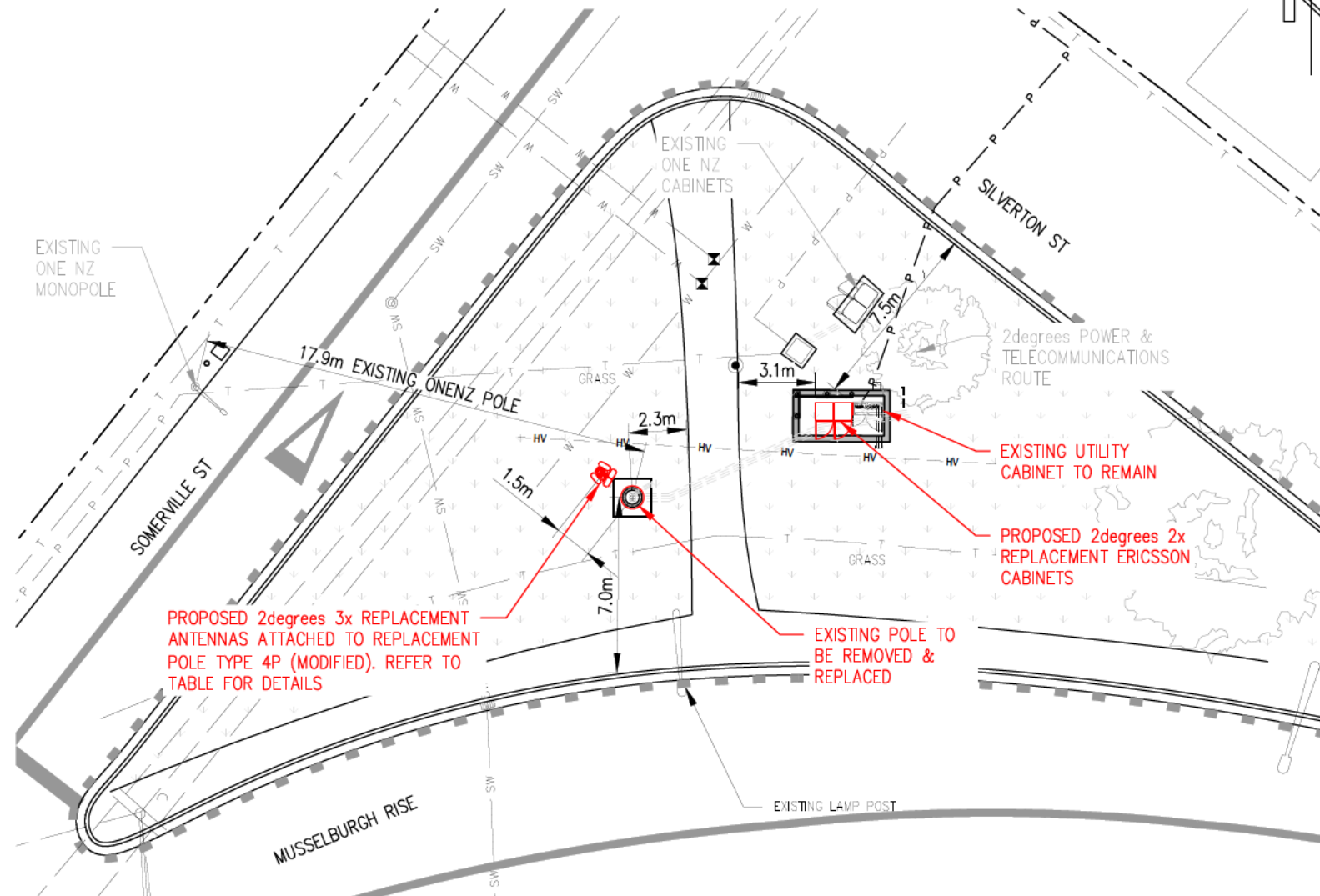
ONE NZ RF ANTENNA INFORMATION		
SECTOR	AZIMUTH (Deg)	ANTENNA TYPE
SECTOR 1	TBC	742 215
SECTOR 2	TBC	742 215
SECTOR 3	TBC	742 215



RF ANTENNA INFORMATION								
SECTOR	AZIMUTH (Deg)	ANTENNA MID HEIGHT (m)	MECH. DOWN TILT	PROPOSED ANTENNA	ANTENNA SIZE H x W x D (m)	RRH	EXISTING ANTENNA	EXISTING ANTENNA SIZE H x W x D (m)
1A	30°	15.9	—	ASI4518R84v06	2.099 x 0.499 x 0.206	2	742 224 v02	1.933 x 0.261 x 0.146
1B	30°	17.6	—	AIR3268	0.568 x 0.370 x 0.146	—	—	—
2A	120°	15.9	-2	AQU4520R01v06	2.550 x 0.749 x 0.226	2	742 224 v02	1.933 x 0.261 x 0.146
2B	120°	17.6	-2	AIR3268	0.568 x 0.370 x 0.146	—	—	—
3A	230°	15.9	—	ASI4518R84v06	2.099 x 0.499 x 0.206	2	742 224 v02	1.933 x 0.261 x 0.146
3B	230°	17.6	—	AIR3268	0.568 x 0.370 x 0.146	—	—	—

ANCILLARY EQUIPMENT DIMENSIONS (H x W x D)
RRH 4499 B1 B3 = 553 x 398 x 151, 32kg
RRH 4499 B01 B28 = 553 x 398 x 190, 37.6kg

MICROWAVE ANTENNA INFORMATION				
DISH TYPE	AZIMUTH (Deg)	ANTENNA MID HEIGHT (AGL) (m)	EXISTING ANTENNA TYPE	FAR END SITE
A	312°	9.0	HUAWEI Ø300	TO BE REMOVED



SITE LAYOUT PLAN
SCALE 1:250

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USE DIMENSIONS SHOWN, ONLY SCALE FROM THIS DRAWING FOR APPROXIMATE USE.

NOTES:

- ACCESS FROM PUBLIC ROAD – SOMERVILLE ST OR MUSSELBURGH RISE.
- ANTENNA HEIGHTS ARE ABOVE GROUND LEVEL (APPROX.).
- IT IS THE CONTRACTOR'S RESPONSIBILITY TO LOCATE AND PROTECT ALL EXISTING SERVICES IN THE VICINITY OF THE SITE (INCLUDING THOSE NOT NECESSARILY SHOWN) PRIOR TO COMMENCEMENT OF ANY WORKS ON SITE. SERVICES SHOWN ARE INDICATIVE ONLY.
- ALL EXISTING SURFACES AND FEATURES HAVE BEEN FULLY REINSTATED TO THEIR ORIGINAL CONDITION TO THE SATISFACTION OF THE ENGINEER ON COMPLETION OF THE WORKS.
- POWER SUPPLY FROM POWER POLE IN SILVERTON STREET APPROX. 20m AWAY. EARTHING/LIGHTNING OPTION 1.
- REFER TO 2degrees STD-D500 SERIES FOR SIGNS A, B, C, & D. (SELECT AS REQUIRED)
- THE ACTIVE ASSETS OF THE SITE ARE OWNED BY 2degrees AND THE PASSIVE ASSETS OF THE SITE ARE OWNED BY CONNEXA, FURTHER CLARIFICATION OF THIS IS AVAILABLE ON REQUEST.

7	PROPOSED POLE AND EQUIP SWAP (HEADFRAME REVISED)	JG	28.05.25
6	PROPOSED POLE AND EQUIPMENT SWAP	SG	30.04.25
5	REPLACED HUAWEI MICROWAVE W/ ERICSSON MICROWAVE	JV	13.08.24
4	ADDITIONAL CABINETS	CE	30.10.20
3	CABINET & POLE LOCATION SEE REVISION CLOUDS	SW	28.12.11
2	VF DUCTS REMOVED	RL	23.08.11
1	APPROVED	NP	30.08.11
0	FOR APPROVAL	EH	15.07.11

Two Degrees Networks Limited

PROJECT ADDRESS:

ANDERSONS BAY, JUNCTION
OF MUSSELBURGH RISE, SOMERVILLE ST
AND SILVERTON ST, DUNEDIN

PROJECT TITLE:

LOCALITY & SITE LAYOUT PLAN

DESIGNED: CH	DATE: 30.08.11	SITE ACO APPROVAL: PR	CAD FILE:
DRAWN: RV	DATE: 30.04.25	RMA APPROVAL: SF	CAD DIR:
REVIEWED: BT	DATE: 31.08.11	RF APPROVAL: EB	SITE ACO BY:
STRUCTURAL AB	DATE: 26.10.11	TRANS. APPROVAL: PU	SURVEY BY: PPP LTD
APPROVED: CM	DATE: 26.10.11	CONST. APPROVAL: PB	SURVEY DATE: 17.05.2011
			ASBUILT BY:

2degrees DRAWING TITLE:

GREENFIELD (URBAN) - PLANNING

JOB No: OTG-071-024	CANDIDATE ID: F	SCALE: AS SHOWN A3 ORIGINAL	A3
------------------------	--------------------	-----------------------------------	----

DRAWING No:

OTG-071-024-P01

REV

7



PROPOSED SOUTHEASTERN PHOTOMONTAGE
SCALE NTS

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USE DIMENSIONS SHOWN, ONLY SCALE FROM THIS DRAWING FOR APPROXIMATE USE.

NOTES:

1.REFER TO SHEET P01.

2.SITE ACCESSIBLE BY CHERRY PICKER.

3. PROPOSED REPLACEMENT CABINETS TO BE PAINTED BLACK BEAN GREEN COLOUR TO MATCH EXISTING. COLOUR CODE N64-001-161.

7	PROPOSED POLE AND EQUIP SWAP (HEADFRAME REVISED)	JG	28.05.25
6	NEW REPLACEMENT ANTENNAS & CABINETS	SG	30.04.25
5	REPLACED HUAWEI MICROWAVE W/ ERICSSON MICROWAVE	JV	13.08.24
4	ADDITIONAL CABINETS	CE	30.10.20
3	CABINET & POLE LOCATION SEE REVISION CLOUDS	SW	20.12.11
2	VF DUCTS REMOVED	RL	23.08.11
1	APPROVED	NP	30.08.11
0	FOR APPROVAL	EH	15.07.11

Two Degrees Networks Limited

PROJECT ADDRESS:

ANDERSONS BAY, ADJACENT TO JUNCTION OF MUSSELBURGH RISE, SOMERVILLE ST AND SILVERTON ST, DUNEDIN

PROJECT TITLE:

SITE PHOTOMONTAGE

DESIGNED: CH	DATE: 30.08.11	SITE ACO APPROVAL: PR	CAD FILE:
DRAWN: RV	DATE: 30.04.25	RMA APPROVAL: SF	CAD DIR:
REVIEWED: BT	DATE: 31.08.11	RF APPROVAL: EB	SITE ACO BY:
STRUCTURAL AB	DATE: 26.10.11	TRANS. APPROVAL: PU	SURVEY BY: PPP LTD
APPROVED: CM	DATE: 26.10.11	CONST. APPROVAL: PB	SURVEY DATE: 17.05.2011

2degrees DRAWING TITLE:

GREENFIELD (URBAN) - PLANNING

JOB No: OTG-071-024	CANDIDATE ID: F	SCALES: AS SHOWN A3 ORIGINAL	A3
DRAWING No:			REV
OTG-071-024-P03			7



Appendix B Acoustic Assessments

Resource Consent Application

**Roadside Telecommunication Facility Upgrade, opposite 12A Silverton Street,
Andersons Bay**

Two Degrees Networks Limited

SLR Project No.: 810.V16399.00001

12 August 2025



ERICSSON 6140 VIBRATIONS CABINET

ERIC NOISE ASSESSMENT

PREPARED FOR

Two Degrees

DATE

22 November 2021

Generic telecommunications cabinet assessment prepared by Styles Group for Two Degrees.

REVISION HISTORY

Rev:	Date:	Comment:	Version:	Prepared by:
1	22/11/21		Final	Olivier Ghysel, MASNZ Senior Consultant Styles Group
				Jon Styles, MASNZ Director and Principal Styles Group

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Appendices

Appendix A	Cabinet noise level contours
Appendix B	Ericsson Test Report

Executive summary

Two Degrees has engaged Styles Group to undertake noise measurements of the Ericsson 6140 telecommunications cabinet (the **Cabinet**) to inform the site-selection and consenting of future Cabinets.

Styles Group have undertaken a combination of noise measurements and analysis of manufacturer test data to determine the noise emissions of the Cabinet operating under its various fan speeds. The fans speeds vary to maintain an internal cabinet temperature that is generally within 5 degrees Celsius of the ambient outdoor temperature.

Styles Group have assessed the noise emissions of the Cabinet and have prepared noise level predictions and contours to determine the distances at which the noise limits of the Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016 (**NESTF 2016**) or any District Plan standard or condition of resource consent or designation will be complied with.

The noise level contours in Appendix A display the Cabinet noise emissions operating at ambient temperatures of 15 °C, 20°C and 25° on a grid with the Cabinet positioned at the centre. The user of this advice can apply the noise contours and the corresponding grid to estimate the Cabinet noise emissions at the relevant assessment location prescribed by the relevant noise standard.

1.0 Introduction

Two Degrees has engaged Styles Group to undertake noise measurements of the Ericsson 6140 telecommunication cabinet (the **Cabinet**).

This advice is intended to inform the site-selection and consenting of future Cabinets by:

- i. Identifying the noise emissions of the Cabinet when its fans operate at various ambient temperatures.
- ii. Enabling the Cabinet noise emissions to be compared to any telecommunications noise limit prescribed in the Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016 (**NESTF 2016**) or any District Plan standard or condition of resource consent or designation.

2.0 Cabinet noise measurements

Styles Group have undertaken a combination of noise measurements and analysis of manufacturer test data to determine the noise emissions of the Cabinet when operating under its various fan speeds. The fans speeds vary to maintain an internal cabinet temperature that is generally within 5 degrees Celsius of the ambient outdoor temperature.

The cooling fans are the only appreciable noise source from a Cabinet whilst in operation. There are no other sources associated with a Cabinet that would normally be present in a field installation that would otherwise influence the noise levels.

Styles Group undertook noise measurements of the Cabinet operating at an ambient temperature of 15°C. Manufacturer test data was relied on to determine the noise emissions from the Cabinet operating at higher ambient temperatures.

Some telecommunications cabinets are capable of being manipulated to run at fan speeds representative of different ambient temperatures, without the ambient temperature actually changing. This was not possible with this Cabinet. We have conducted a detailed analysis of manufacturer test data to calculate noise levels at ambient temperatures of 20°C and 25°C. The manufacturer has provided detailed test data and fan speed curves for our analysis.

2.1 Noise measurements- Cabinet operating at 15°C

Styles Group undertook noise measurements of the Cabinet with its cooling fans operating at a speed corresponding to an ambient temperature of 15°C on 14 July 2021.

All measurements were conducted using a 2250 Bruel & Kjaer Type 1 sound level meter. The meter and microphone were calibrated in an accredited laboratory and were field-calibrated both before and after the measurements using a Bruel & Kjaer 4231 calibrator.

We performed reverberation time measurements to determine the reverberation time of the test environment (a large atrium in a commercial building). These reverberation measurements have been used to correct the final measured levels to represent an open-air environment. Styles Group used a Norsonic dodecahedron loudspeaker Nor276 with its power amplifier Nor280 and a calibrated Sound Level Meter Nor 140 to determine the reverberation time.

All measurements were conducted in accordance with NZS6801:2008 *Acoustics - Measurement of Environmental Sound* and ISO 3744:2010(E) *Determination of sound power levels of noise sources using sound pressure- Engineering methods for an essentially free field over a reflecting plane*.

2.2 Testing methodology

Styles Group's noise measurements were undertaken in a large indoor environment during the night (when ambient noise levels are sufficiently low) and were conducted according to the provisions of ISO 3744:2010(E).

We applied the provisions of clause Annex C.1 of ISO 3744:2010(E) to determine the microphone measurement positions using the parallelepiped method. The provisions of clauses 8.2.3 and Annex A.3.2 of ISO 3744:2010(E) were used to provide the appropriate adjustments to the raw measured data based on the reverberation time and background noise within the space in which the measurements were made. This required measurement of the reverberation time within the space and background noise measurements of the space with no cabinets running.

Noise measurements were undertaken with the cooling fans in the Cabinet operating at a speed corresponding to an ambient temperature of 15°C. We understand that the fans typically run at this speed during night-time operation in most parts of New Zealand for most of the year.

2.3 Methodology for calculation of fan speed noise levels at 25°C

Styles Group have reviewed the noise test report prepared by Ericsson (the **Ericsson Report**) to understand the Cabinet noise emissions operating under higher ambient temperatures than the test conditions. A copy of the Ericsson Report is provided in Appendix B.

The Ericsson Report provides test results of a Cabinet operating at ambient temperatures of 15°C, 20°C, 35°C and 45°C. The tests were conducted in accordance with ISO 3744:2010(E).

The Ericsson Report does not provide test results for a Cabinet operating at an ambient temperature of 25°C. Styles Group has used Ericsson measurement data and specific fan speed curves to determine the Cabinet noise levels operating at an ambient temperature of 25°C. The same calculation procedure was used to calculate the noise levels at an ambient temperature of 15°C to compare to our measurements. The agreement was good, with the calculated levels within approximately 1 decibel of the measured levels.

Ericsson have provided the graph below demonstrating the relationship between the ambient temperature and fan running speeds.

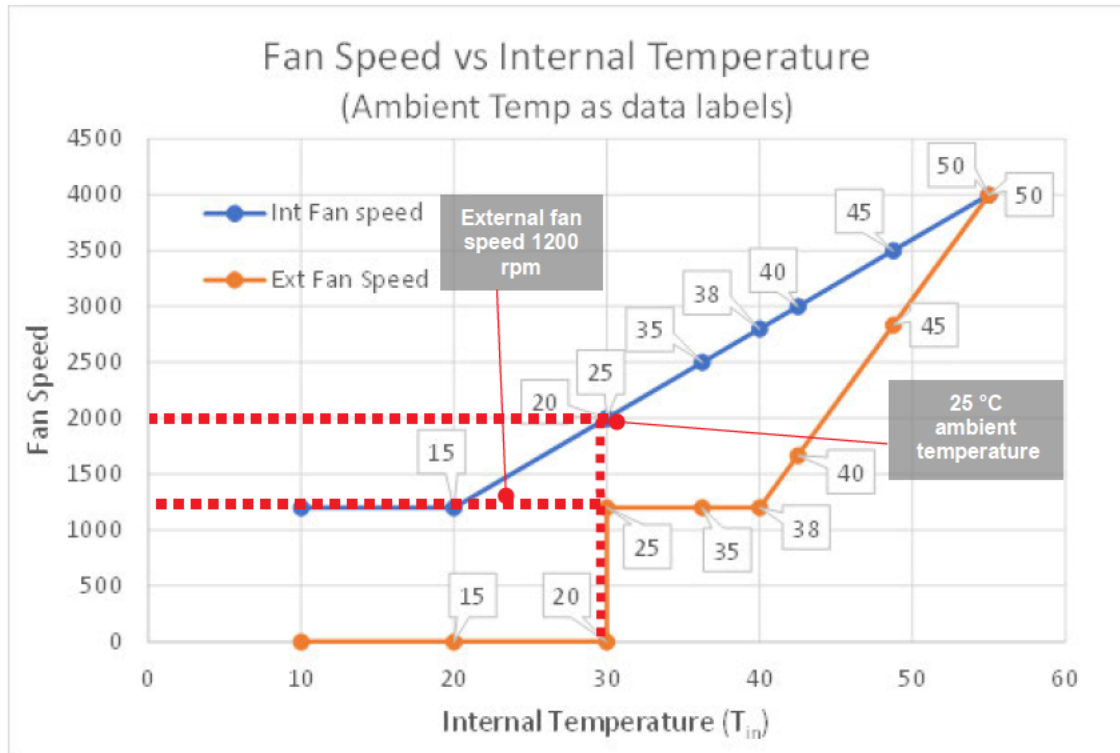


Figure 1 Relationship between internal fan and ambient temperatures and fan speed

Source: Ericsson

Figure 1 shows that the external fans (orange curve) run at the same speed (1200 rpm) whether the ambient temperature is 25°C or 35°C. It also shows that the external fans do not run at up to 20°C of ambient temperature. This means that the measurements taken at ambient temperatures of 20°C or below represent the contribution from the internal fans only.

Based on this information, we determined the daytime noise levels (25°C fan setting) following the methodology detailed below:

1. We identified the noise levels measured at 35°C from Ericsson data (x),
2. We calculate the difference in noise levels generated by the internal fans only between 35°C and 25°C (y) based on fan speed data and measurements at temperatures below 20°C,
3. We subtracted (y) from (x) to get the overall noise level generated by the cabinet at an ambient temperature of 25°C.

3.0 Cabinet measurement results and predicted noise levels

The sound power levels for the Cabinet with its fans operating at a speed corresponding to an ambient temperature of 15°C, 20°C and 25°C are presented in Table 2.

Table 1 Calculated Sound Power Levels (LWA) in accordance with ISO 3744: 2010(E)

Ambient temperature	dBA L _w
15°C	53 dB
20°C	59 dB
25°C	63 dB

The fan noise source is very steady and the levels do not fluctuate with time. The L_{A10} (or L₁₀) noise levels are typically within 1dB of the L_{Aeq} values. This means the L_{Aeq} values can also be used for comparison against any noise limits specified using the L_{A10} descriptor. The L_{AFMax} noise levels are no more than 3dB higher than the L_{Aeq} noise levels.

We note that the minimum signal to noise ratio (SNR) of 6dB, in accordance with clause 8.2.3 of ISO 3744: 2010(E) was not achieved in all frequency bands for measurements of the cabinets off axis from the cooling fans. This was due to the low noise level of the cabinets relative to the background noise levels of the measurement space. However, the fundamental frequencies that control the overall noise output of the cabinets were well above the minimum SNR requirements and are sufficiently robust for the purpose of environmental noise predictions.

Figure 2 displays a typical spectrum of the noise from the Cabinets measured at 1m from the cabinet cooling fan at an ambient temperature of 15°C. We note that both objectively and subjectively, the spectrum does not exhibit any special audible characteristics or have any notable tonal qualities. The objective tonality test for special audible characteristics in accordance with clause B4.3 of NZS 6802: 2008 was performed to confirm the absence of tonality.

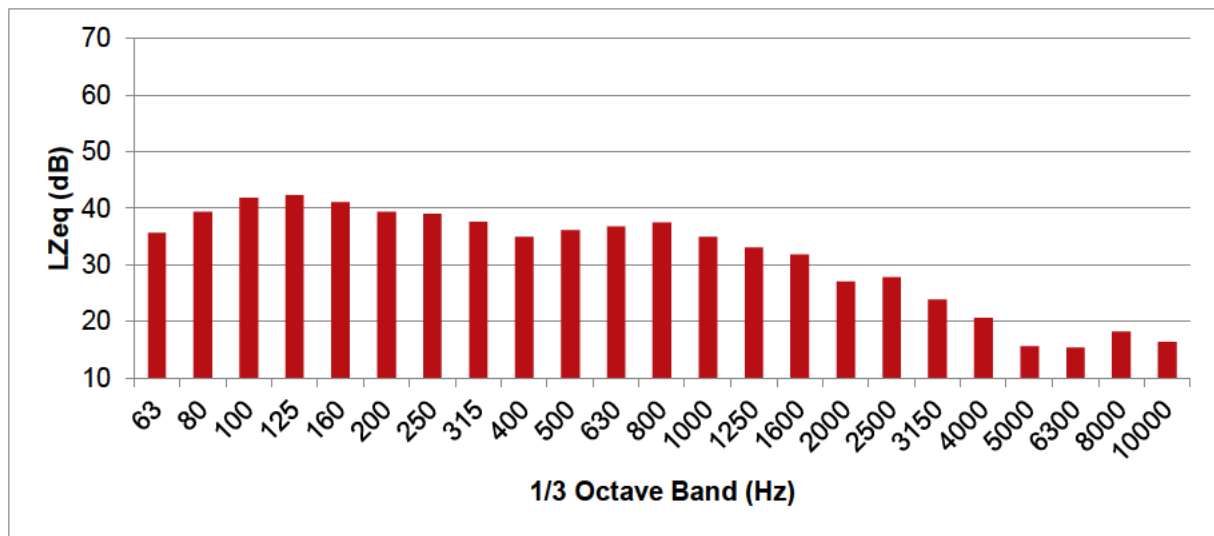


Figure 2 Typical Sound Pressure Level (SPL) spectrum at 1m from Cabinet (cooling fan operating at an ambient temperature of 15°C)

The predicted noise level for any given scenario can be determined by reference to the noise level contour plots presented in Appendix A for the temperature setting(s) that is relevant to the proposed installation. The noise contours presented in Appendix A incorporate two reflecting planes (floor and cabinets themselves).

4.0 Noise limits for telecommunications cabinets

The NESTF 2016 provides nationwide regulations for the installation of telecommunications facilities. The NESTF 2016 controls the noise emissions from a cabinet when installed in locations within and outside of the road reserve.

We have reproduced the NESTF 2016 noise limits for cabinets in road reserves below. We understand the NESTF 2016 enables a local authority to prescribe District Plan noise standards for telecommunications cabinets installed outside the road reserve that are more stringent than the regulations. The relevant noise standards applying to cabinets outside the road reserve, or cabinets subject to a designation condition or condition of resource consent should be confirmed with the relevant local authority.

4.1.1 NESTF 2016 noise limits for a cabinet in a road reserve

Regulation 24 of the NESTF 2016 prescribes noise limits for a cabinet in the road reserve. Regulation 24 requires:

- (3) If the cabinet is located in a residential zone¹ or an adjoining road reserve², the noise limits for the cabinet are, -
 - (a) between 7am and 10pm, 50 dB $L_{Aeq(5min)}$; and
 - (b) between 10pm and 7am,-
 - (i) 40 dB $L_{Aeq(5min)}$; and
 - (ii) 65 dB L_{AFMax} ,
- (4) For any other cabinet, the noise limits for the cabinet are,-
 - (a) at any time, 60 dB $L_{Aeq(5min)}$; and
 - (b) between 10pm and 7am, 65 dB L_{AFMax}

Regulation 24(6) requires the noise levels must be measured and assessed:

- a) 1m from the side of the building (or on the vertical plane of the side of the building) if a building containing a habitable room is within 4m of the road reserve where the cabinet is located
- b) Or, in all other cases, at least 3m from the cabinet and within the boundaries of land adjoining the road reserve where the cabinet is located.

4.1.2 Measurement and assessment of noise levels

Regulation 24(5) of the NESTF 2016 requires the measurement of noise from a cabinet must be:

- a) made in accordance with NZS 6801:2008 Acoustics – Measurement of environmental sound (**NZS 6801**); and
- b) adjusted in accordance with NZS 6801 to a free field incident sound level; and
- c) assessed in accordance with NZS 6802:2008 Acoustics – Environmental noise (**NZS 6802**).

Styles Group has adhered to NZS 6801 and NZS 6802 in the measurement and assessment of noise from the Cabinet.

4.2 Compliance distances for NESTF 2016 noise limits

Styles Group have measured and assessed the Cabinet noise emissions to determine the distances at which the maximum permitted noise levels of the NESTF 2016 will be complied with.

¹ Defined in the NESTF 2016 as "...an area identified in a district plan or proposed district plan as being zoned primarily for residential activities, but not an area zoned for rural/residential or countryside living activities (however described)."

² Defined in the NESTF 2016 as a "formed legal road and any land next to it up to the legal boundary of the adjoining land".

The noise level contours in Appendix A display the Cabinet noise emissions operating at ambient temperatures of 15°C, 20°C and 25° on a grid with the Cabinet positioned at the centre. The user of this advice can apply the noise contours and the corresponding grid to estimate the Cabinet noise emissions at the relevant assessment location prescribed by the relevant noise standard.

4.3 Vibration

We have not encountered any vibration effects from telecommunications cabinets. We did not observe any noticeable or readily measurable vibration effects beyond the Cabinet during the testing. We note that the only moving parts inside telecommunications cabinets are light weight cooling fans. The fans do not have sufficient mass to vibrate the enclosure or the ground around them. The generation of any perceptible vibration effects would require a significantly greater amount of moving mass inside the enclosure.

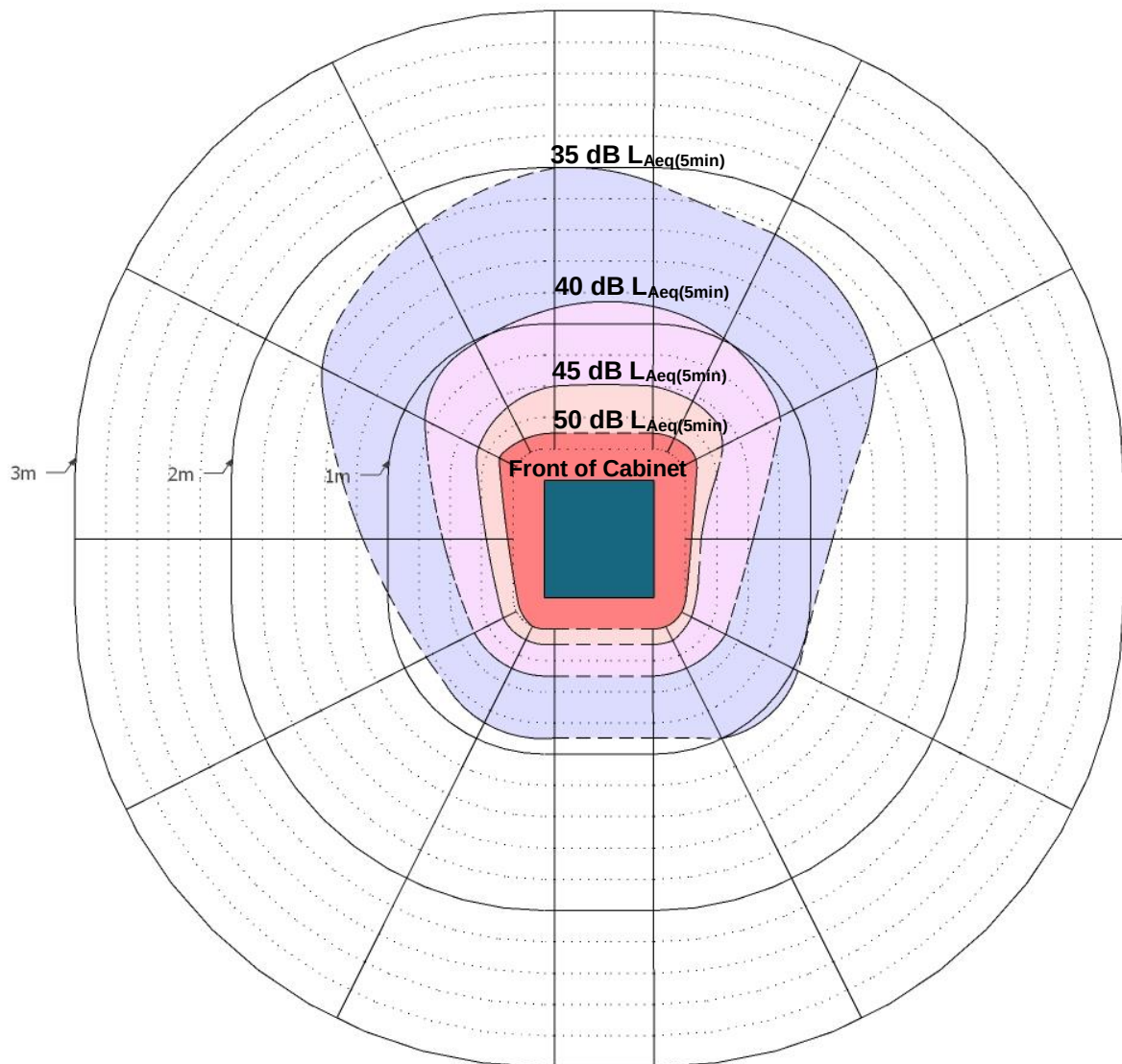
5.0 Conclusion

Styles Group have measured and assessed the noise emissions of a Cabinet and have prepared noise level predictions and contours to determine the distances at which the maximum permitted noise levels of the NESTF 2016 (or noise limit prescribed in a District Plan standard or condition in a designation of resource consent) will be complied with.

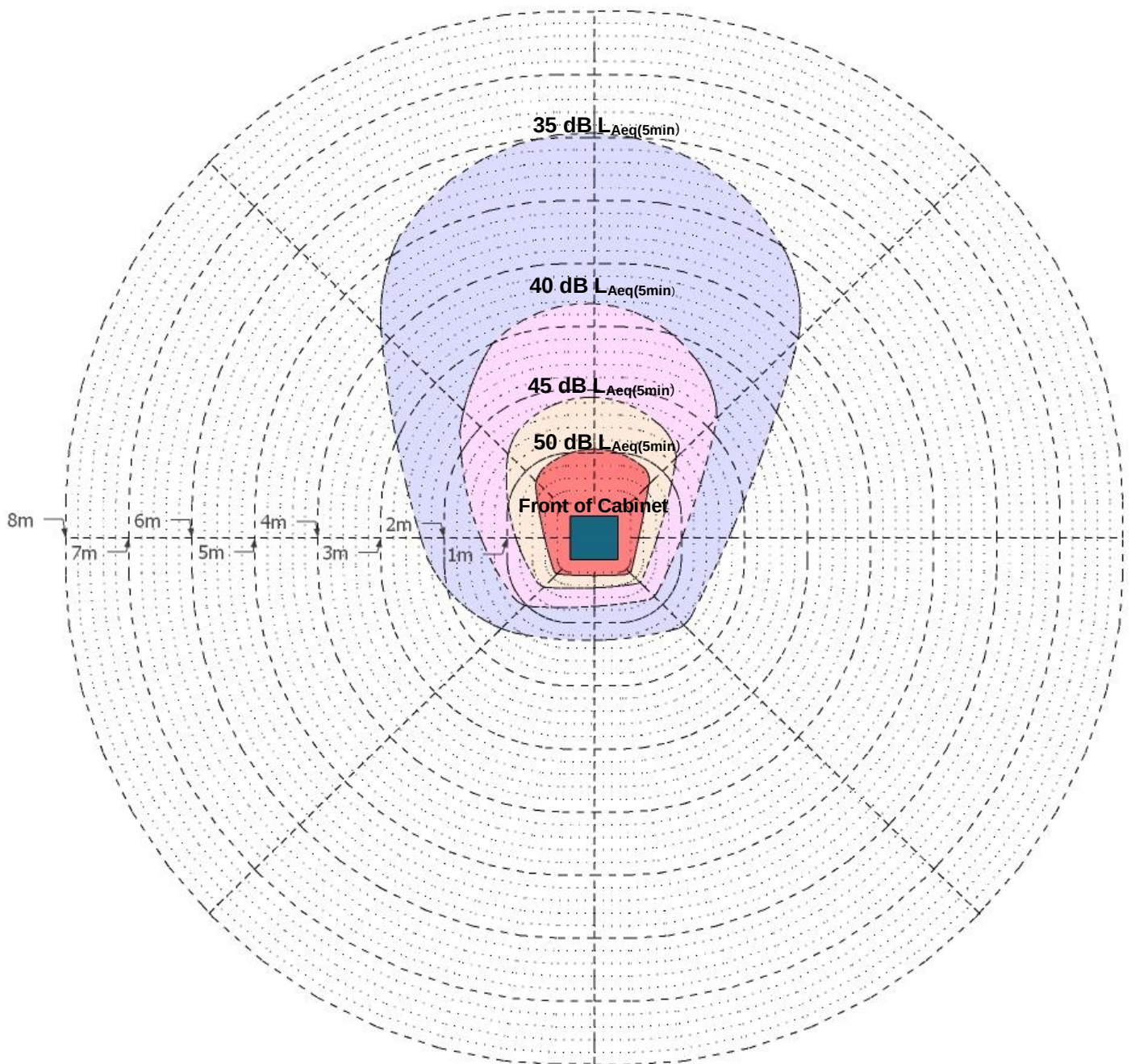
The noise level contours in Appendix A display the Cabinet noise emissions operating at ambient temperatures of 15°C, 20°C and 25° on a grid with the Cabinet positioned at the centre. The user of this advice can apply the noise contours and the corresponding grid to estimate the Cabinet noise emissions at the relevant assessment location prescribed by the relevant noise standard.

Appendix A Cabinet noise level contours

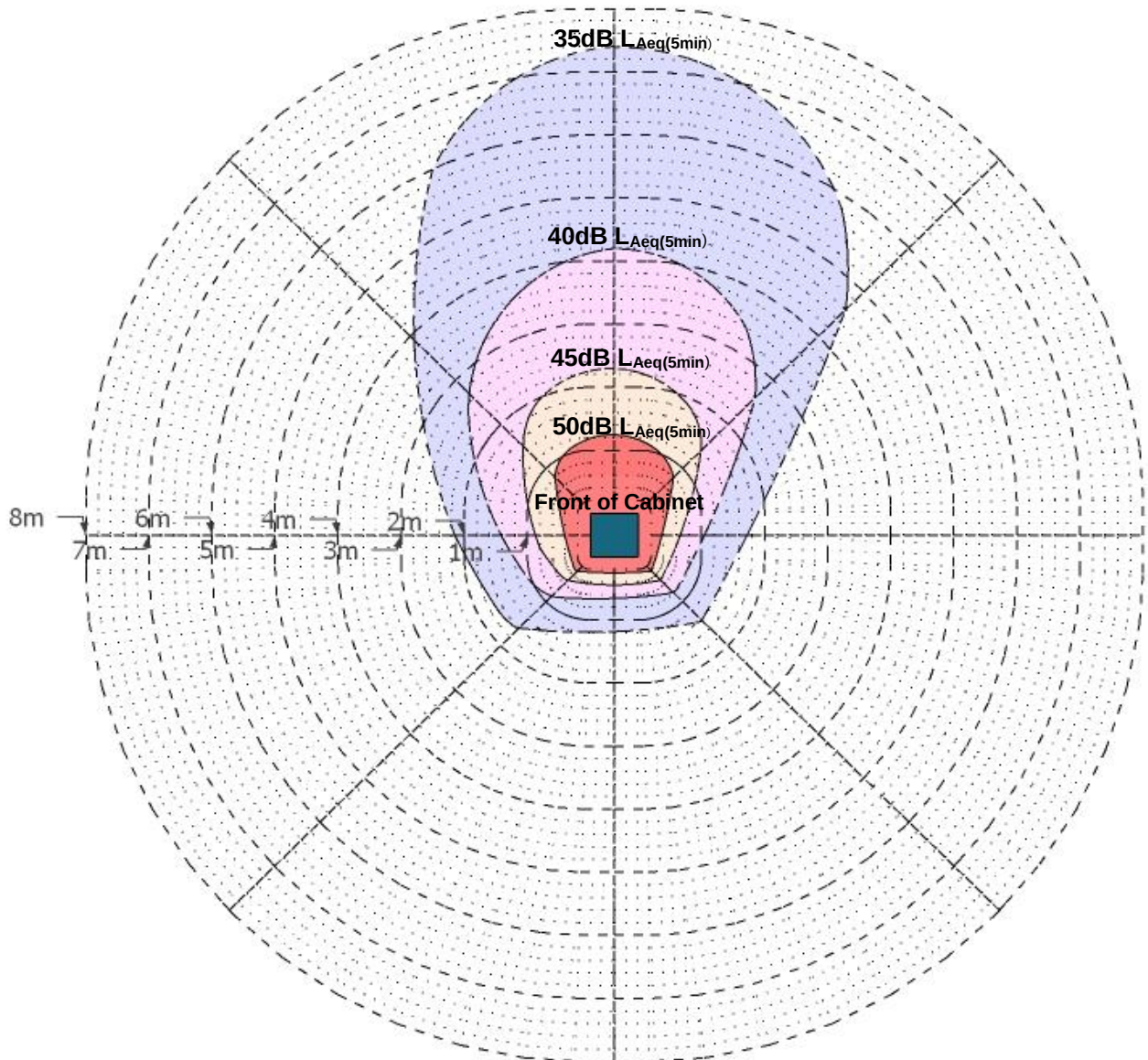
Ambient temperature 15°C



Ambient temperature 20°C



Ambient temperature 25°C



Appendix B Ericsson Test Report

Test summary - Noise test Enclosure 6130/6140

Test Report

NOTE! Enclosure 6130 and Enclosure 6140 utilizes same fan units and fan curve. Noise profile is same. Difference in cooling capacity is dependent on HEX core size. Noise test conducted for characterization only.

1 Test specimen

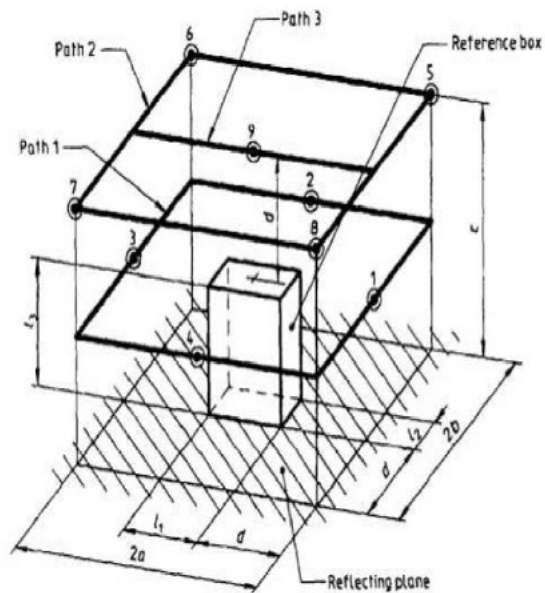
Test unit	Enclosure 6140 AC 21kW	Model	BMK 905 073/1
Product revision	R1A	Purpose	New product verification
Test qty	1 pcs	Test purpose	Noise
		Test location	Shenzhen, China
Start date	2020-10-20	End date	2020-10-20
Room ambient	26degC	Test spec.	ISO 3744:2010 GB/T 3767-1996
Relative hum.	55-56%	Ambient press.	100.5kPa
Background noise	7.1dBA	Test Sound Field	Free field over reflecting plane (semi-anechoic room)
Criteria		Noise characterization	
Conclusion		N/A	
Remarks		N/A	



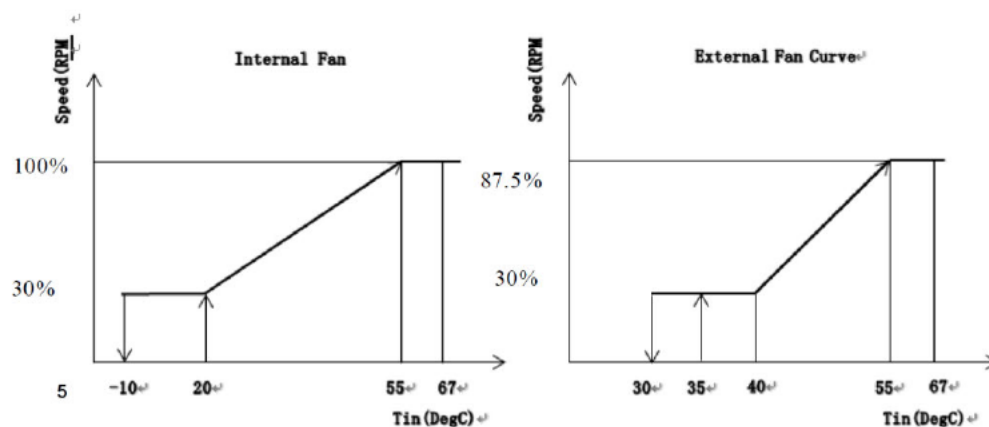
1.1 Test setup



Equipment in noise chamber



Microphone setup (measurement distances = 1m)



Fan curves

1.2 Test cases

	Ambient temp.	Internal fan 1/2 (rpm)	Internal fan 1/2 (rpm)
1	15degC	1200/0	0/0
2	15degC	1200/1200	0/0
3	20degC	2000/2000	0/0
4	35degC	2500/2500	1200/1200
5	45degC	3500/3500	3000/3000

1.3 Results

A-weighted measurements points on each MP, sound pressure level L_{PA} (dB)

MP = Microphone position

	15degC (1)	15degC (2)	20degC	35degC	45degC
MP1	35.5	37.6	50.7	56.8	66.6
MP2	31.1	31.8	39.9	44.1	54.8
MP3	29.3	29.6	36.8	40.7	48.7
MP4	31.7	32.2	42.5	45.4	54.7



MP5	30.9	31.9	41.4	50.1	58.0
MP6	29.4	29.7	33.2	41.2	46.5
MP7	30.2	30.5	33.9	41.1	47.5
MP8	31.5	32.3	40.8	49.0	57.8
MP9	31.4	31.9	39.9	44.7	52.1

A-weighted sound power level L_{WA} (dB)

	15degC (1)	15degC (2)	20degC	35degC	45degC
A-weighting	47.3	48.4	58.9	65.3	74.4



Appendix C Raduofrequency Report

Resource Consent Application

**Roadside Telecommunication Facility Upgrade, opposite 12A Silverton Street,
Andersons Bay**

Two Degrees Networks Limited

SLR Project No.: 810.V16399.00001

12 August 2025

28 April 2025

Dunedin City Council
Ground Floor, Civic Centre
50 The Octagon
Dunedin
New Zealand

RE: Cumulative RF Emissions at Two Degrees Networks Limited telecommunications facility, Andersons Bay, Junction of Musselburgh Rise & Somerville Street, Dunedin (ref. OTG-071-024)

This letter is to address the cumulative effects of radio emissions (at the above-mentioned address) to further the information submitted to Council as required in the NES Regulations (2016), Regulation 55. It is also prepared in accordance with AS/NZS 2772.2:2016 Radiofrequency fields - Part 2: Principles and methods of measurement and computation - 3 kHz to 300 GHz. Please note all Two Degrees Networks Limited site installations are planned and operated in accordance with NZS 2772.1:1999 Radiofrequency fields – Maximum exposure levels - 3kHz to 300 GHz.

2degrees intend to install, operate, and maintain a facility at a total height of 18m at the above address. The public cannot get closer to the antennas other than directly below the antennas at ground level.

I have examined the above site in terms of the proposed Two Degrees Networks Limited facility antennas, the physical environment, and the predicted RF emission levels of the proposed antennas and those of any existing service providers. Based on this prediction, there are radiofrequency field levels at places in the vicinity of the facility that are reasonably accessible to the general public that may reach or exceed 25% of the maximum level authorised by NZS 2772.1. Therefore, in accordance with Regulation 55(4) of the NES (2016), 2degrees will ensure that the local authority receives, within 3 months of the upgrade becoming operational, a report that must—

- (a) be prepared in accordance with AS/NZS 2772.2; and
- (b) provide evidence that the actual radiofrequency field levels at places in the vicinity of the facility that are reasonably accessible to the general public comply with NZS 2772.1.

RF exposure calculations have considered antennas for each technology that result in the worst-case compliance distances for each site. This allows specific antenna models to be selected at a later stage of the design process whilst ensuring emissions will be retained within the calculated envelopes.

Any reasonably accessible nearby areas of adjoining and surrounding properties have been considered for this assessment.

Yours sincerely,



Mike Burgess
Snr RAN Engineer
Two Degrees Networks Limited





Appendix D Landscape Visual Assessment

Resource Consent Application

**Roadside Telecommunication Facility Upgrade, opposite 12A Silverton Street,
Andersons Bay**

Two Degrees Networks Limited

SLR Project No.: 810.V16399.00001

12 August 2025

Proposed 2Degrees Telecommunication Facility Upgrade, Andersons Bay, Dunedin

Landscape Effects Assessment Report

23 May 2025



Prepared by

MIKE MOORE

BSc, Dip LA, MRRP, ANZILA

LANDSCAPE ARCHITECT

4 Castlewood Road, Dunedin

Tel 0274 360 163 Email mike@mmla.co.nz

Introduction

Two Degrees Networks Ltd (2degrees) are applying for resource consent to upgrade their existing roadside telecommunication in Andersons Bay, Dunedin, at the junction of Musselburgh Rise, Somerville Street and Silverton Street. There is an existing 12m telecommunication facility comprising of a monopole with antennas attached to the top of a pole and contained in a shroud. This facility is to be replaced with an 18m high telecommunication facility comprising of a monopole with antennas attached to the top of the pole.

The proposed upgrade requires a restricted discretionary resource consent under the National Environmental Standards for Telecommunication Facilities (NESTF) and Dunedin City District Plan (DCDP), to exceed the allowable facility height, pole width, antenna width standards and the introduction of a headframe. The NESTF matters of discretion relate to the effects of the standards not complied with. The DCDP matters of discretion include the effects on the character and amenity of the zone and effects on surrounding sites' residential amenity. This report addresses these matters and will be structured as follows:

- Methodology
- Site and area description
- The character and amenity values of the area
- The proposed development
- Landscape effects
- Dunedin City District Plan provisions assessment
- Conclusion

Methodology

This assessment follows the concepts and principles outlined in Te Tangi a te Manu, the New Zealand Institute of Landscape Architects (NZILA) Best practice guidelines¹, and has been informed by a review of the relevant statutory provisions and a site visit on 7 April 2025. Photo-simulations have been prepared, and these are consistent with the principles outlined in the NZILA Best Practice Guide 10.2 for visual simulations². A method statement for the photo-simulations is included in **Appendix A**.

Site and area description

As shown in **Figure 1**, the site where the telecommunication facility upgrade is proposed comprises of a triangular shaped grassed island between the formed carriageways of Musselburgh Rise, Silverton Street and Somerville Street in Andersons Bay, Dunedin. It slopes toward the north and contains road signage, services ducts, telecommunications cabinets, native shrubs, and the existing 12m high 2degrees telecommunication facility. There is a similar but taller telecommunication facility owned by One NZ on the opposite side of Somerville Street, approximately 16m high and 18m from the existing structure on the site. There are also three street light poles approx. 10m high alongside the curve of Musselburgh Rise on its northern side.

The site context is largely suburban in character but with the large expanse of Bayfield Park across Somerville Street. Whilst the immediate area is zoned General Residential 2 in the DCDP which provides for medium density suburban residential living, current residential density is more consistent with a General Residential 1 environment and section sizes generally range from approximately 400m² – 1000m². Houses are typically single or double storey, built in a range of materials. and date mainly from the early – mid 20th century. The area has an air of maturity with well-established gardens.

Figures 2a – 8a illustrate the character of the site and area.

¹ Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines', Tuia Pito Ora New Zealand Institute of Landscape Architects, July 2022.

² New Zealand Institute of Landscape Architects, Best Practice Guide Visual Simulations BPG 10.2.

The character and amenity values of the area

Amenity values are defined in Section 2 of the Resource Management Act (RMA) as *those natural or physical qualities and characteristics of an area that contribute to people's appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes*.

The DCDP contains city-wide rules for network utilities (Section 5) which provides for infrastructure including telecommunication facilities throughout the city where impacts on the visual amenity and character of the zone and effects on amenity of surrounding residential activities are avoided or, if avoidance is not practicable, adequately mitigated.

The DCDP contains no schedules or values statements outlining the attributes that are important in creating the character and amenity of the residential zones. The zone description for the General Residential 2 zone (Section 15.1.1.2) however, states that the zone provides for change in the existing urban form to medium density suburban residential living and that this will provide a range of housing choices over time, including well-designed multi-unit developments such as terrace housing and low-rise apartments typically up to 9m in height (generally two-storeys).

The Plan provisions aim to ensure that the General Residential 2 zone is predominantly for residential activities, that its character is based on medium density housing no greater than 9m in height and set back 4.5m from roads, that there are high levels of sunlight access to outdoor living areas, that garages, carports, parked cars and that service / storage areas are not visually dominant from the street, Building scale and the impact of fencing is also controlled through maximum wall length and fencing height and permeability standards.

In my assessment, the area is a modified suburban residential environment which currently has a character based on relatively low residential density and an attractive mix of built and vegetative elements. With Residential 2 zoning it can be expected that

density of built form will increase with the attendant reduction of the current softening / balancing impact of vegetation.

The road reserve within the site's vicinity is highly modified and vertical infrastructure is prevalent, comprising of two existing telecommunication facilities, streetlight poles and above ground powerlines.

In this particular location, the impact of natural elements is provided by the presence of vegetation, and by the large expanse of parkland at Bayfield Park which also allows views of the water in Andersons Bay Inlet and the Otago Harbour beyond. Factors that detract from pleasantness and aesthetic coherence are the relatively wide, busy road (Musselburgh Rise / Silverton Street) and the clutter associated with signage, power and light poles, and the existing telecommunications facilities and associated equipment cabinets.

I interpret 'residential amenity' as being based on the residential character of the area but as also including other qualities such as adequate privacy, sunlight to living spaces (indoor and outdoor), lack of nuisance etc.

The proposed development

The proposal is to upgrade an existing 2degrees telecommunication facility. The upgrade involves the replacement of the existing 12m high telecommunication facility with one that is 18m high i.e. a 6m increase in the overall facility height is proposed. The proposal also includes installation of two replacement equipment cabinets. Generally, the proposed facility is larger in scale as outlined in the table below.

	Existing facility	Proposed facility
Overall height	12m	18m
Pole Height	9.24m	14.3m
Headframe / antenna diameter	0.6m	1.05m
Headframe / antenna length	2.74m	3.7m
Pole diameter	Approx. 0.55m base – tapering	Approx 0.49m base tapering to

	to 0.3m top	0.3m top
Ancillary equipment	1 x 0.4m diam microwave dish	6 x RRH
Cabinets	3.1m x 0.48m x 1.6m	2.7m x 0.75m x 1.6m

Figure 9 illustrates the proposed upgrade.

It is proposed that the telecommunication facility pole and antennas are finished in the same light grey tone as the existing facility. This colour is consistent with other vertical roadside infrastructure and gives a relatively light appearance which generally blends well against the sky. Likewise, the replacement equipment cabinets will be coloured in the same dark green tone that the existing cabinets are. These blend well with the shrub backdrop.

Landscape effects

Landscape effects are defined in the NZILA Landscape Assessment Guidelines³ as follows:

‘An adverse or positive outcome for a landscape value as a consequence of changes to a landscape’s physical attributes’.

As noted in the Guidelines, visual effects are a subset of landscape effects, and a visual effect is described as *‘a consequence for landscape values as experienced in views’*.⁴

I assess the landscape effects of the development against the amenity values discussed above, and those inherent in the relevant statutory provisions. Landscape effects may be positive or adverse in nature and I rate the degree of effect in terms of the 7-point rating scale recommended in the NZILA Landscape Assessment Guidelines. The relationship of this scale to RMA terminology is illustrated below in the table copied from Te Tangi a te Manu.

³ Te Tangi a te Manu, Aotearoa New Zealand Landscape Assessment Guidelines, Tuia Pito Ora New Zealand Institute of Landscape Architects, July 2022.

⁴ Te Tangi a te Manu para 6.08.

Degree of effect assessment scale

			SIGNIFICANT			
LESS THAN MINOR	MINOR		MORE THAN MINOR			
VERY LOW	LOW	LOW-MOD	MODERATE	MOD-HIGH	HIGH	VERY HIGH

Physical effects

The proposed upgrade will result in the same number of telecommunication facilities in the area, but instead of a 16m and a 12m structure, there will be a 16m and an 18m structure. This will increase the presence and prominence of telecommunications facilities in the site's vicinity to a modest degree. In terms of the ground level cabinets, the footprint of these will be roughly similar in area, as will the visual bulk. Both the existing and proposed cabinet arrangements blend / will blend well with the adjacent vegetation.

Telecommunications facilities are clearly utilitarian in character. Being vertical in form and higher than most buildings (and trees) in the suburban environment surrounding they add to 'clutter' in the landscape and have effects on residential amenity values that are adverse in nature in my assessment. I consider however, that the fact that there are already similar telecommunication facilities present helps to mitigate the degree of effect of the proposed upgraded facility. This means that the effect of the proposed facility will be an increase in an existing adverse effect rather than an entirely new effect. The increase in the bulk of the proposed facility (relative to the existing facility) is in general scale relationship to the increase in its height. Considering the One NZ facility as well, I estimate that the overall percentage scale increase in the visual bulk of telecommunications poles at this site is approximately 21.5%.⁵

Overall, it is my assessment that the physical effects associated with the new upgraded telecommunication facility on the residential amenity values will be adverse in nature but low-moderate (minor) in degree.

⁵ 12 & 16m pole vs 18 & 16m pole

Visual effects

The following tables provide an assessment of the visual effects of the proposed upgraded telecommunication facility from representative viewpoints in public places surrounding. Figure 1 shows the viewpoint locations and **Figures 2b – 8b** are photo-simulations illustrating the likely visual effects of the upgraded facility. The method adopted to create these simulations is outlined in **Appendix A**.

Figure 2b: Silverton Street

Relevance of viewpoint	A nearby viewpoint on an adjacent public road.
Viewing distance to facility	83m
Description of effect	This is a view north-westward down Silverton Street toward Bayfield Park, Andersons Bay Inlet, and the harbour. The viewpoint is slightly elevated in relation to the site. The proposed facility will replace the existing facility and will be seen in conjunction with the One NZ facility behind, as well as with various power and light poles both in the road reserve and the park beyond. Telecommunications facilities already adversely affect suburban / residential amenity values and the proposal will result in increased adverse effects associated with greater scale and height of one of the facilities. The degree of effect is mitigated by the presence of other poles, the slimline form of the proposed facility and its recessive colour seen against the sky and harbour.
Rating nature / degree of effect	Adverse / low-moderate (minor)

Figure 3b: Seating area, 12A Silverton Street

Relevance of viewpoint	A semi public amenity sitting space directly opposite the site
Viewing distance to facility	30m

Description of effect	This is a view northward across Silverton Street toward Bayfield Park and Andersons Bay Inlet. The viewpoint is slightly elevated in relation to the site. The existing One NZ and 2degrees facilities are visible in the foreground, along with light / electricity poles and road signage. The telecommunications facilities loom over the viewpoint but their dominance is mitigated by their light mass and slimline form. Telecommunications facilities already adversely affect suburban / residential amenity values and the proposal will result in cumulative adverse effects associated with greater scale and height of one of the poles. The degree of effect is mitigated by the presence of other poles, the slimline form of the proposed facility and its recessive colour seen against the sky and harbour.
Rating nature / degree of effect	Adverse / low-moderate (minor)

Figure 4b: Musselburgh Rise

Relevance of viewpoint	A nearby viewpoint on an adjacent public road.
Viewing distance to facility	125m
Description of effect	This is a view north-eastward down Musselburgh Rise toward Somerville Street. The proposed facility will replace the existing facility and will be seen in conjunction with the One NZ facility close by, as well as with various power and light poles, and with signage in the road reserve. Telecommunications facilities already adversely affect suburban / residential amenity values and the proposal will result in cumulative adverse effects associated with greater scale and height of one of the poles. The degree of effect is mitigated by the presence of other poles, the slimline form of the proposed facility and its recessive colour seen against the sky and background cityscape.
Rating nature / degree of effect	Adverse / low-moderate (minor)

Figure 5b: Bayfield Park)

Relevance of viewpoint	A nearby viewpoint on an adjacent public park
Viewing distance to facility	45m
Description of effect	This is a view south-eastward toward Silverton Street and the surrounding suburban residential cityscape from an upper terrace level on Bayfield Park. The viewpoint is slightly lower in relation to the site. The proposed facility will replace the existing facility and will be seen in conjunction with the One NZ facility, which is closer, as well as with various power and light poles, and signage in the road reserve. Telecommunications facilities already adversely affect suburban / residential amenity values and the proposal will result in cumulative adverse effects associated with greater scale and height of one of the poles. The degree of effect is mitigated by the presence of other poles, the slimline form of the proposed facility and its recessive colour seen against the sky.
Rating nature / degree of effect	Adverse / low-moderate (minor)

Figure 6b: Bayfield Park, Inlet edge

Relevance of viewpoint	A moderate proximity viewpoint on a well-used walking track / park
Viewing distance to facility	210m
Description of effect	This is a view south-eastward across open parkland toward the site and the suburban residential cityscape beyond the inlet edge of Bayfield Park. The viewpoint is lower in relation to the site. The telecommunication facilities are seen in conjunction with other built elements including various power and light poles, and sports posts within the park and their visual impact becomes less with increasing viewing distance. Telecommunications facilities already adversely affect suburban / residential amenity values and the proposal will result in cumulative adverse effects associated with greater scale and height of one of the poles. Where the

	existing pole does not break the skyline, the proposed structure will from this viewpoint. The degree of effect is mitigated by the presence of other poles, the slimline form of the proposed facility and its recessive colour seen against the sky.
Rating nature / degree of effect	Adverse / low (minor)

Figure 7b: Somerville Street

Relevance of viewpoint	A nearby viewpoint on an adjacent public road.
Viewing distance to facility	80m
Description of effect	This is a view westward along Somerville Street to its intersection with Musselburgh Rise from a slightly lower viewpoint. The view is constrained to the north and south by plantings, fences and houses. The proposed facility will replace the existing facility and will be seen in conjunction with the One NZ facility close by, as well as with various power and light poles, and with signage in the road reserve. Telecommunications facilities already adversely affect suburban / residential amenity values and the proposal will result in cumulative adverse effects associated with greater scale and height of one of the poles. The degree of effect is mitigated by the presence of other poles, the slimline form of the proposed facility and its recessive colour seen against the sky and background cityscape.
Rating nature / degree of effect	Adverse / low-moderate (minor)

Figure 8b: Marne Street

Relevance of viewpoint	A more distant viewpoint on a public road where clear views of the proposed facility are available.
Viewing distance to facility	457m

Description of effect	This is a view south-eastward across Andersons Bay Inlet and Bayfield Park to the site and the suburban cityscape of Andersons Bay beyond. The telecommunication facilities are seen in conjunction with other built elements including various power and light poles, and sports posts within the park and their visual impact is modest from this distance. Telecommunications facilities already adversely affect suburban / residential amenity values and the proposal will result in cumulative adverse effects associated with greater scale and height of one of the poles. The existing pole does not break the skyline and the proposed structure will not either, from this viewpoint. The degree of effect is mitigated by the presence of other poles and the slimline form of the proposed facility.
Rating nature / degree of effect	Adverse / very low (less than minor)

Private viewpoints

The visual effects assessment above is based on analysis from public viewpoints only. In relation to private viewpoints, the taller replacement facility will clearly have a degree of greater visibility and visual impact than the existing structure, which will be potentially greatest from properties in close proximity. To assess the extent of additional visibility of the proposed telecommunication facility from dwellings in the area surrounding comparative drone footage was obtained from 12m and 18m height above ground at the site. Comparative visibility of the 18m structure with the existing 12m structure has been assessed for properties within a 130m radius of the site. This distance is based on my assessment from street viewpoints, of the approximate distance at which the telecommunication facility becomes a visually prominent element within the landscape. My analysis is outlined as follows:

Properties with dwellings with significant glazing facing the site visible

12m height	18m height
7 Silverton Street	7 Silverton Street
9 Silverton Street	9 Silverton Street
12A Silverton Street	12A Silverton Street

14 Silverton Street	14 Silverton Street
17 Silverton Street	17 Silverton Street
18 Silverton Street	18 Silverton Street
23 Silverton Street	23 Silverton Street
	34 Silverton Street
234 Musselburgh Rise	234 Musselburgh Rise
	10 Cranston Street

From this I conclude the following:

- Most of the close proximity residences that will have visibility of the proposed upgraded facility already have visibility of the existing structure. I assess the degree of additional adverse effect as no greater than those assessed from public viewpoints at similar proximity (i.e. low-moderate (minor)) for the reasons given in relation to the street viewpoints above.
- From 34 Silverton Street visibility of the proposed facility will be largely blocked by intervening built form and vegetation except that it will appear as a new element in northward views from two first floor windows at a distance of approximately 120m. Overall, I assess effects as adverse / low-moderate (minor).
- From 10 Cranston Street, the proposed upgraded facility will be visible from north-west and south-west facing windows above intervening buildings at a distance of approximately 85m, where currently the existing facility is mainly screened. Considering the intervening built form and the (lesser) presence and impact of the existing structure in the views, I assess effects as adverse / low-moderate (minor).
- The property closest to the site with clear views of the existing facility, is 12A Silverton Street. The proposed upgraded facility will appear more dominant than the existing facility from this property. Adverse effects on residential amenity values from this viewpoint will be mitigated by the fact that this is not a residential site (Plunket rooms) and because the proposed facility will amplify an existing effect rather than create a new one. I assess effects as adverse / low-moderate (minor).

Landscape effects – discussion

Landscape effects are effects on the relevant values – in this case, amenity values based on medium density residential character including softening and balancing of built elements with vegetative / natural elements. Utility structures are already present within the road reserve, and these have adverse effects on the existing residential character in my assessment. The effects relevant to this application are the increased effects associated with upgrading the existing 12m high telecommunication facility with a new 18m high telecommunication facility. From the analysis set out above it is my conclusion that the adverse landscape / amenity effects of the proposed upgrade will be at most, low-moderate (minor) in degree and will decrease with increasing viewing distance.

Dunedin City District Plan provisions assessment

In terms of Rule 5.3.2 in the Dunedin City District Plan (DCDP), the proposed facility is a restricted discretionary activity. Under Rule 5.8.2.1 the matters of discretion include the effects on the character and amenity of the zone and effects on surrounding sites' residential amenity. The following is my assessment against the relevant DCDP provisions.

Objective 5.2.1 <i>The benefits of <u>network utility activities</u>, ... are recognised by enabling them to establish, operate and upgrade efficiently and effectively, while:</i> <i>a. achieving the amenity and character objectives for the zone, to the degree practicable; and</i> <i>b. achieving the relevant objectives and policies for any applicable overlay zone, scheduled <u>site</u>, or mapped area, for those areas.</i>	In my assessment the proposed larger replacement telecommunications facility will result in additional adverse effects on the Residential 2 zone character and amenity that will be no greater than low-moderate (minor) in degree. There are no overlays, scheduled sites or mapped areas impacted.
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Policy 5.2.1.5 Only allow <u>network utility structures - large scale</u> (in all zones) where the activity is designed and located to avoid or, if avoidance is not practicable, adequately mitigate: a. adverse effects on visual amenity and the character of the zone in which the activity is located; and b. adverse effects on the amenity of any surrounding <u>residential activities</u>.	The proposal involves replacing an existing telecommunication facility with a similar but larger facility, co-sited with another telecommunication facility of similar character. The increased scale of the upgraded facility will result in adverse effects on both the residential zone character and amenity and the visual amenity from surrounding residential properties where visible. Mitigation factors include the co-siting near other vertical infrastructure in the road corridor, the slimline form of the facility, and its grey colour to minimise its visual bulk and to provide visual uniformity with the One NZ telecommunication facility. I assess the degree of adverse effects as no greater than adverse / low-moderate (minor).
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Conclusion

This application seeks to replace an existing 12m high telecommunication facility with an 18m high telecommunication facility at the intersection of Silverton Street, Somerville Street and Musselburgh Rise, where there is also another similar One NZ telecommunication facility that is approximately 16m high.

The site is located within the General Residential 2 zone and in the road reserve in which the existing telecommunication facilities and vertical infrastructure including power lines and streetlights contribute to visual 'clutter' and have adverse effects on residential character and amenity and the visual amenity of surrounding residential properties in my assessment. The larger upgraded telecommunication facility proposed will result in cumulative adverse effects that I have assessed as no greater in degree than low-moderate (minor).

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

Mike Moore

Registered NZILA Landscape Architect

Appendix A: Photo-simulation method

1. Viewpoints have been selected based on their representativeness of the effects of the proposed upgraded telecommunication facility, and their significance. These are confined to public viewpoints and (due to significance) are largely in close proximity to the site. The viewpoints are mapped in Figure 1.
2. Photographs from each viewpoint were obtained on 7 April 2025 in clear, sunny conditions near midday. Photographs were taken on a Canon EOS 80D digital camera. The focal length set was 50mm for all panoramas, except for Figure 3 which was set at 37mm due to the close proximity of the viewpoint. Photographs have been stitched using 'Lightroom' software to create a panorama approximating the primary horizontal field of human view (except for where fences or plantings confined the field of view).
3. A 3D digital model of the proposed telecommunication facility was created in 'Blender' 3D modelling software based on the plans provided by Two Degrees Networks Ltd.
4. An image of the proposed upgraded facility as viewed from the relevant perspective, derived from the digital model, was superimposed on the photograph with the location and scale of the structure ascertained with reference to the existing facility (same site and known height). In all images, the proposed facility is shown with the same antenna orientation facing the viewpoint as it is unknown what the actual orientation will be. The original images had the existing pole removed using 'Photoshop' software.
5. A fully rendered photo composite image was produced using 'Blender' software and guided by the shading and lighting on the existing facility.
6. The photo-simulations are presented as useful guides to be used in conjunction with visits to the viewpoints to assess the visual effects of the proposed facility. Each image presented (Viewpoints 2 - 8) include a photograph of the existing view and a photo-simulation of the view with the existing facility removed and the proposed facility simulated.

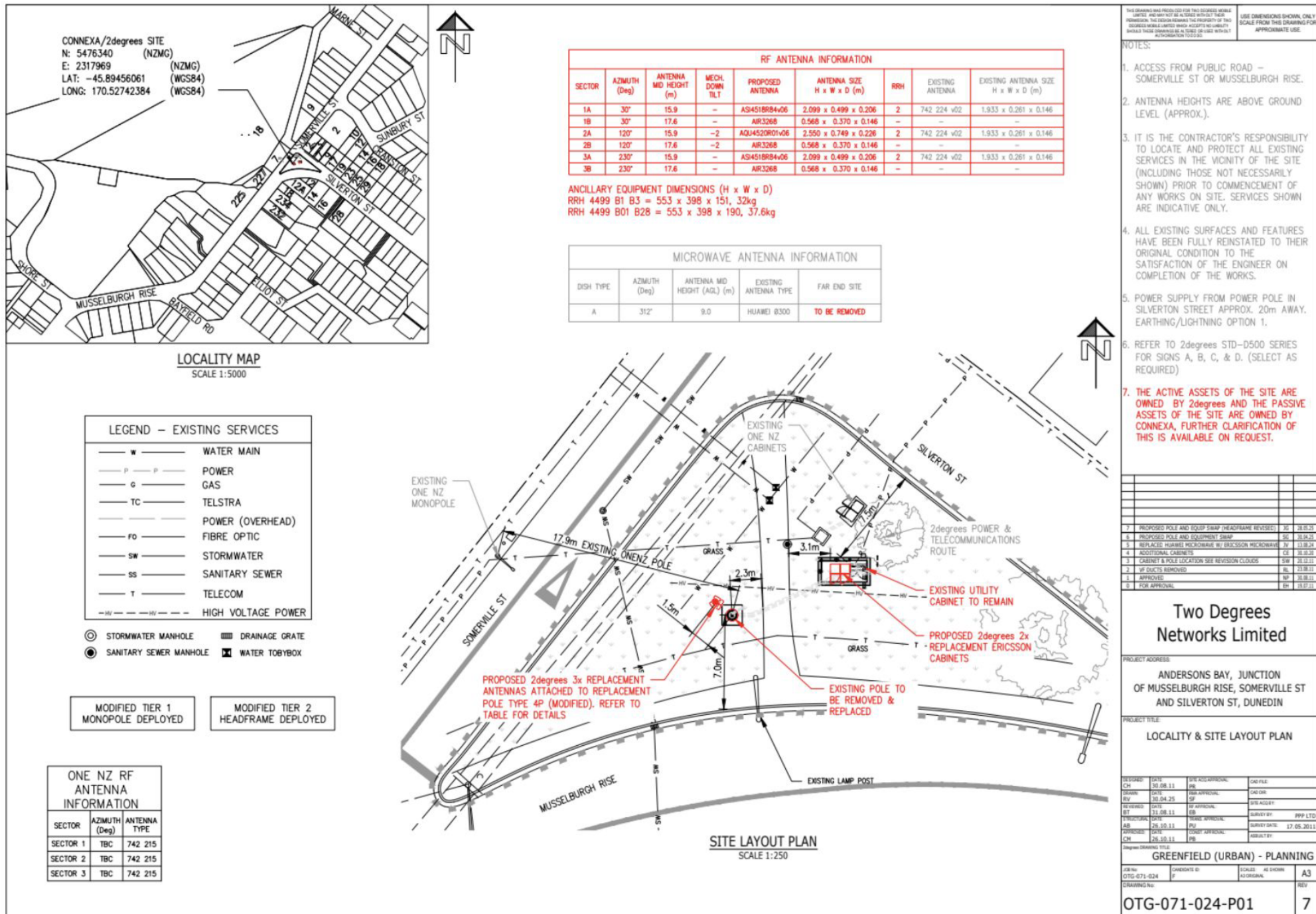


Figure 9a: Proposed Telecommunications Facility - Site Plan

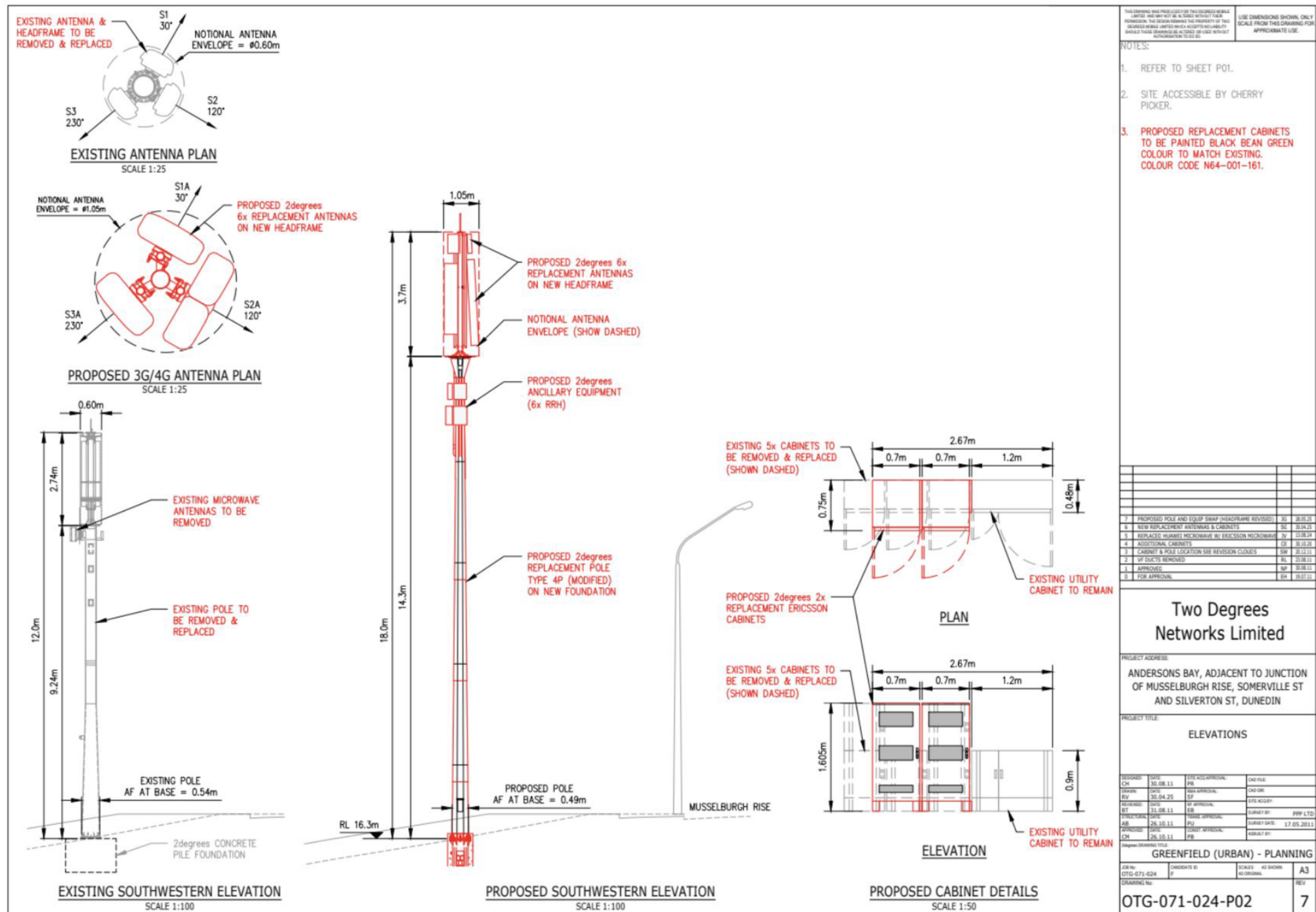


Figure 9b: Proposed Telecommunications Facility - Elevations



Appendix E Rules Assessment - National Environmental Standards for Telecommunication Facilities 2016 (NESTF)

Resource Consent Application

**Roadside Telecommunication Facility Upgrade, opposite 12A Silverton Street,
Andersons Bay**

Two Degrees Networks Limited

SLR Project No.: 810.V16399.00001

12 August 2025

Rules assessment

The following rules assessment has determined that resource consent is required for a **restricted discretionary activity**.

Note that only those rules and standards which are relevant to this application have been addressed.

Regulation	Compliance	Non-compliance
Part 2 - Carrying out of regulated activities		
<i>Regulation 11 – Activity complying with standard is permitted activity</i> <i>A regulated activity is a permitted activity if it is carried out in accordance with the standard.</i>		Does not comply. The proposal will not be carried out in accordance with the standards. As such, the activity status is determined by the assessment below.
<i>Regulation 12 – Status if not permitted activity</i> <i>If a regulated activity is not a permitted activity under regulation 11,—</i> (a) <i>if the facility is an RFG facility, the status of the activity is to be determined under regulation 13; or</i> (b) <i>otherwise, the status of the activity is to be determined under regulations 14 to 18.</i>	The facility is an RFG facility and therefore the status is determined under regulation 13.	
<i>Regulation 13 – RFG facilities: status in respect of generation of radiofrequency fields</i> (1) <i>This regulation applies to a regulated activity if—</i> (a) <i>the facility is an RFG facility; and</i> (b) <i>the activity is not a permitted activity under regulation 11.</i> (2) <i>If regulation 55 is complied with,—</i> (a) <i>in respect of the generation of radiofrequency fields, the activity is a permitted activity; and</i> (b) <i>in all other respects, the status of the activity is to be determined in accordance with regulations 14 to 18.</i>	Met. The activity is not a permitted activity under regulation 11. Met. The proposal will meet regulation 55, as assessed below. The status of the activity is determined by regulations 14 to 18.	

Regulation	Compliance	Non-compliance
Regulation 15 – Restricted discretionary activities (1) A regulated activity is a restricted discretionary activity if— (a) it is carried out not in accordance with the standard; and (b) under the relevant district plan or proposed district plan, it is a restricted discretionary activity. (2) For the purposes of section 87A(3)(a) of the Act, discretion is restricted over the subject matter of each regulation (or component of a regulation)— (a) compliance with which is part of the standard; and (b) that is not complied with.		Consent required. The proposal is not carried out in accordance with all relevant standards. The proposal is a restricted discretionary activity under the Dunedin City 2nd Generation District Plan (2GP) and therefore, it is a restricted discretionary activity under the NESTF.
Part 3 - Regulated activities and standards Subpart 1 - Cabinets		
Regulation 19 – Regulated activity and standard (1) The installation and operation of a cabinet by a facility operator is a regulated activity. (2) The standard for the activity is that — (a) regulation 20 or 21, as applicable, must be complied with; and (b) if the cabinet is in a road reserve,— (i) regulation 22 must be complied with (subject to regulation 23); and (ii) regulation 24 must be complied with; and (c) if the cabinet is not in a road reserve, regulation 25 must be complied with; and	This regulation applies, the proposal involves the installation of cabinets. Met, as assessed below. N/A – the replacement cabinets are not in a road reserve. Met, as assessed below.	

Regulation	Compliance	Non-compliance
(d) <i>each regulation in subpart 5, if it applies, must be complied with; and</i> (e) <i>if the activity includes earthworks, regulation 54 must be complied with; and</i> (f) <i>if the cabinet is an RFG facility, regulation 55 must be complied with.</i>	Met. As assessed below, the proposed cabinets will comply with the relevant regulation in subpart 5. N/A – no earthworks are required for the proposed upgrades. N/A – the cabinets are not an RFG facility.	
<i>Regulation 20 – Cabinet not servicing antenna on building</i> (1) <i>This regulation applies to any cabinet other than one to which regulation 21 applies.</i> (2) <i>This regulation is complied with if-</i> (a) <i>the height, footprint, and grouping rules in subclause (3) are complied with; and</i> (b) <i>one of the following applies:</i> (i) <i>the cabinet's equipment does not require power;</i> (ii) <i>power for the cabinet's equipment is provided by a self-contained power unit;</i> (iii) <i>the power supply for the cabinet's equipment is connected under the ground or inside the cabinet</i> (3) <i>The height, footprint, and grouping rules are as follows:</i> (a) <i>if the cabinet is in a road reserve that is in, or adjoins, a residential zone,</i> (i) <i>the height of the cabinet must not be more than 1.8m; and</i> (ii) <i>the footprint of the cabinet must not be more than 1.4m²; and</i>	This regulation applies, the proposal involves the installation of cabinets. Met. As assessed below subclause (3) is complied with. Met. Power for the cabinets is connected within the cabinet. Applies and met. The site is in a road reserve land that is zoned General Residential 2 under the 2GP. Each of the proposed equipment cabinets measures 1.605 m(h) x 0.7 m(w) x 0.75 m(d). The existing utility cabinet measures 0.9 m(h) x 1.2m(w) x 0.48 m(d). Each cabinet has a footprint of less than 1.4m².	

Regulation	Compliance	Non-compliance
<i>(iii) the group rules in regulation 22 must be complied with (subject to regulation 23):</i> <i>(b) if the cabinet is in any other road reserve –</i> <i>(c) if the cabinet is not in a road reserve and is in a residential zone</i> <i>(d) if the cabinet is not in a road reserve and is not in a residential zone, ...</i> <i>In this regulation, part of a road reserve adjoins a residential zone if that part of the road reserve adjoins, and is on the same side of the road as, land that is in a residential zone.</i>	As assessed below, regulation 22 is complied with. N/A – as assessed above, the proposed cabinets are in a road reserve that is within a residential zone. N/A – the cabinets are in a road reserve. N/A – the cabinets are in a road reserve.	
<i>Regulation 21 – Cabinet servicing antenna on building</i>	N/A – the proposal will not service antennas on a building.	
<i>Regulation 22 – Group rules for cabinets in road reserves</i> <i>(1) The group rules for a cabinet in a road reserve are that, at the time a cabinet is installed,—</i> <i>(a) the cabinet must be—</i> <i>(i) at least 30 m away from any other cabinet that is on the same side of the road; or</i> <i>(ii) in a group of cabinets; and</i> <i>(b) if the cabinet is in a group,—</i> <i>(i) each cabinet in the group must be at least 30 m away from any cabinet that is on the same side of the road and is not in the group; and</i> <i>(ii) the total footprint of all cabinets in the group must not be more than 2 m².</i>	Met. The replacement equipment cabinets will be in a group with the existing 2degrees utility cabinet to remain, and therefore, regulation 22(1)(a)(ii) can be met. Relevant. The new cabinets are within 30m of existing One.NZ cabinets on the same side of the road, however they are the same distance from the One.NZ cabinets and therefore it is considered existing use rights apply. Met. The total footprint of the cabinets will be approximately 1.4m² and therefore, not more than 2m².	

Regulation	Compliance	Non-compliance
<i>(2) Two or more cabinets are in a group if the distance between each cabinet and the one nearest to it is not more than 0.5 m.</i>	Met. The proposed equipment cabinets and the existing utility cabinet will be in a group as they will be separated by a distance of no more than 0.5m.	
<i>Regulation 23 – Temporary contravention of group rules</i>	N/A – this regulation does not apply as the proposed cabinets do not comply with the group rules in regulation 22 in terms of location.	
<i>Regulation 24 – Noise limits for cabinet in road reserve</i> <i>(1) This regulation applies to a cabinet located in a road reserve.</i> <i>(2) This regulation is complied with if the noise from the cabinet does not exceed the noise limits set out in subclauses (3) and (4).</i> <i>(3) If the cabinet is located in a residential zone or an adjoining road reserve, the noise limits for the cabinet are,—</i> <i>(a) between 7 am and 10 pm, 50 dB LAeq(5min); and</i> <i>(b) between 10 pm and 7 am,—</i> <i>(i) 40 dB LAeq(5min); and</i> <i>(ii) 65 dB LAFmax.</i> <i>(4) For any other cabinet, the noise limits for the cabinet are,—</i> ... <i>How noise to be measured</i> <i>(5) The measurement of the noise from a cabinet must be—</i> <i>(a) made in accordance with NZS 6801; and</i> <i>(b) adjusted in accordance with NZS 6801 to a free field incident sound level; and</i> <i>(c) assessed in accordance with NZS 6802.</i>	Applies and met. The replacement equipment cabinets are located within the road reserve and in the residential zone. Compliance with regulation 24(3) is confirmed per the Acoustic Assessment attached in Appendix B. In particular, each equipment cabinet will not emit any noise that exceeds 40dB_{LAeq} at a distance of 3m from any side of the cabinets. The replacement cabinets are approximately 7.5m setback from the carriage way of Silverton Street and a pedestrian pathway in the road reserve land. N/A – the cabinets are in a road reserve land. The acoustic assessment is prepared in accordance with the relevant requirements in subclauses 24(5) to (8).	

Regulation	Compliance	Non-compliance
<i>Where noise to be measured</i> <i>(6) If a building containing a habitable room is within 4 m of the road reserve where the cabinet is located, the noise must be measured at a point that is—</i> <i>(a) 1 m from the side of the building; or</i> <i>(b) on the vertical plane of the side of the building.</i> <i>(7) In any other case, the noise must be measured at a point that is—</i> <i>(a) at least 3 m from the cabinet; and</i> <i>(b) within the boundaries of land adjoining the road reserve where the cabinet is located.</i> <i>(8) In this regulation,—</i> <i>adjoining road reserve, in relation to a zone in a district plan or proposed district plan, means that part of a road reserve that adjoins, and is on the same side of the road as, land that is in that zone</i> <i>LAeq(5min) has the same meaning as in NZS 6801</i> <i>LAFmax has the same meaning as in NZS 6801</i> <i>NZS 6801 means NZS 6801:2008 Acoustics – Measurement of environmental sound</i> <i>NZS 6802 means NZS 6802:2008 Acoustics – Environmental noise.</i>		
<i>Regulation 25 – Noise limits for cabinet not in road reserve</i>	N/A – the cabinets are in a road reserve.	
<i>Subpart 2 – Antennas</i>		
<i>Regulation 26 – Antennas on existing poles in road reserve - Regulated activity and standard</i> <i>(1) The installation and operation of an antenna (antenna A) by a facility operator is a regulated activity if—</i> <i>(a) before work to install antenna A begins (date A),—</i> <i>(i) there is a pole (pole A) in a road reserve; and</i>	Applies and met. There is an existing pole in the road reserve, with existing 2degrees antennas attached to. The installation and operation of the existing antennas comply with the Act.	

Regulation	Compliance	Non-compliance
<i>(ii) if there are any antennas attached to pole A (whether operated by the same or a different facility operator), their installation and operation complies with the Act; and</i> <i>(b) antenna A (alone or with 1 or more other antennas) is to be installed—</i> <i>(i) on pole A in pole A's original location; or</i> <i>(ii) on pole A after pole A is moved to a new location; or</i> <i>(iii) on a new pole erected to replace pole A.</i> <i>(2) The standard for the activity is that—</i> <i>(a) regulation 27 must be complied with; and</i> <i>(b) each regulation in subpart 5, if it applies, must be complied with; and</i> <i>(c) if the activity includes earthworks, regulation 54 must be complied with; and</i> <i>(d) if the antenna is an RFG facility, regulation 55 must be complied with.</i>	Met. The existing pole will be replaced by a new monopole erected approximately 1.5m to the northwest of the existing location. N/A – there are no relevant subpart 5 matters. Met. Refer to assessment of regulation 54 below. Met. As assessed below, the proposal will comply with regulation 55.	Does not comply. As assessed below regulation 27 is not complied with.
Regulation 27 – Antenna on existing pole in road reserve <i>(1) This regulation applies to the regulated activity described in regulation 26.</i> <i>(2) This regulation is complied with if, at the time antenna A is installed,—</i> <i>(a) if pole A is moved or replaced, the location of the pole on which antenna A is installed (the final pole)—</i> <i>(i) is in the road reserve; and</i> <i>(ii) is not more than 5 m from pole A's location on date A; and</i> <i>(b) the antenna size rules in subclause (3) or (4) are complied with; and</i>	As assessed above, the proposal is a regulated activity described in regulation 26. Met. The existing pole will be replaced by a new pole in the road reserve and located not more than 5m (i.e. 1.5m to the northwest) from the existing pole.	Does not comply. As assessed below, the proposal does not comply with subclause (3) and

Regulation	Compliance	Non-compliance
(c) the number of dish antennas attached to the final pole is not more than,— (i) if more than 2 dish antennas were attached to pole A on date A, that number; or (ii) otherwise, 2; and (d) the pole height rules in subclause (5) are complied with; and (e) the pole width rules in subclause (6) are complied with; and (f) if the final pole has a headframe, the headframe rules in subclause (7) are complied with. (3) If antenna A is a non-dish antenna, the antenna size rules are that,— (a) if the final pole has a headframe, the width of antenna A must not be more than,— (i) if antenna A is a replacement for an existing non-dish antenna the width of which was more than 0.7 m, the width of the replaced antenna; or (ii) otherwise, 0.7 m; or (b) if the final pole does not have a headframe, the notional envelope for the final pole must not be larger than,— (4) If antenna A is a dish antenna, the antenna size rules are that— ...	Met. No dish antenna is proposed. The existing dish antenna will be removed. Met. The proposed replacement pole meets the pole width rules in subclause (6) as assessed below. N/A – the final pole has a headframe. N/A – no dish antenna is proposed in this application.	subclause (4) does not apply. Does not comply. As assessed below, the proposed replacement pole exceeds the maximum permitted height in subclause (5). Does not comply. As assessed below, the proposed headframe will not meet the headframe rules in subclause (7). Does not comply. The proposed facility has a headframe. One of the proposed antenna measures 2.550 m(h) x 0.749 m(w) x 0.226 m(d) and therefore exceeds 0.7m in width.

Regulation	Compliance	Non-compliance
(5) The pole height rules are that the height of the final pole and all antennas must not be more than the greater of— (a) the height of the baseline pole on the baseline date plus 3.5 m; and (b) the height of the baseline pole and all antennas on the baseline date. (6) The pole width rules are that the width of the final pole must not be more than the width of the baseline pole on the baseline date multiplied by,— (a) if 1 or more antennas were attached to the baseline pole on the baseline date, 1.3; or (b) otherwise, 2. (7) The headframe rules are that— (a) the headframe was on pole A on date A; or (b) the headframe— (i) is a replacement for a headframe that was on pole A on date A; and (ii) has a width that is not more than the width of the replaced headframe.	Met. The baseline pole is 0.54m in width. The proposed pole is 0.49m in width and therefore meets the pole width rule.	Does not comply. The total height of the baseline pole and all antennas on the baseline date is 9.24m. As such, the permitted height is 12.74m. The proposed facility will be 18.0m, exceeding the maximum allowable height under the NESTF by 5.26m. Does not comply. There is no headframe on the existing pole. The upgraded facility will include a 1.05m wide headframe.
Regulation 28 – 29 Antennas on new poles in road reserve - Regulated activity and standard	N/A – the proposal does not involve new poles.	
Regulation 30 – 31 Antennas on existing poles with antennas not in road reserve and in residential zone - Regulated activity and standard	N/A – the proposal is not in a residential zone.	
Regulation 32 – 33 Antennas on existing poles with antennas not in road reserve and not in residential zone - Regulated activity and standard	N/A – the proposal is located in road reserve.	
Regulation 34 – 35	N/A – the proposal does not involve new poles and is located in road reserve.	

Regulation	Compliance	Non-compliance
<i>Antennas on new poles not in road reserve and in rural zone – Regulated activity and standard</i>		
<i>Regulation 36 – 37 Antennas on buildings - Regulated activity and standard</i>	N/A – the proposal does not involve antennas on buildings.	
<i>Subpart 3 – Small cell units</i>		
<i>Regulation 38 – Regulated activity and standard</i>	N/A – the proposal does not involve small cell units.	
<i>Subpart 4 – Telecommunication lines</i>		
<i>Regulation 39 – 40 Customer connection lines - Regulated activity and standard</i>	N/A – the proposal does not involve customer connection lines.	
<i>Regulation 41 – 42 Aerial telecommunication lines along same routes as existing telecommunication or power lines - Regulated activity and standard</i>	N/A – the proposal does not include aerial telecommunication lines.	
<i>Regulation 43 - Underground telecommunication lines – Regulated activity and standard</i>	N/A – the proposal does not involve underground telecommunication lines.	
<i>Subpart 5 – Application of district and regional rules</i>		
<i>Regulation 44 – Trees and vegetation in road reserves.</i>	N/A – the proposal does not involve any clearance or trimming of trees or vegetation clearance in the road reserve	
<i>Regulation 45 – Significant trees</i>	N/A – there are no significant trees listed under the 2GP near the site.	
<i>Regulation 46 – Historic heritage values</i>	N/A – the site is not located within an area of historic heritage in the 2GP.	
<i>Regulation 47 – Visual amenity landscapes</i>	N/A – The proposal is not located on a site subject to visual amenity landscape rules in the 2GP.	
<i>Regulation 48 – Significant habitats for indigenous vegetation</i>	N/A – The proposal is not located on a site subject to	

Regulation	Compliance	Non-compliance
	significant habitats for indigenous vegetation rules in the 2GP.	
<i>Regulation 49 – Significant habitats for indigenous fauna</i>	N/A – the proposed location is not subject to any district plan rules or overlays relating to indigenous fauna.	
<i>Regulation 50 – Outstanding natural features or landscapes</i>	N/A – the proposed location is not subject to any district plan overlays or rules relating to outstanding natural features or landscapes.	
<i>Regulation 51 – Places adjoining coastal marine area</i>	N/A – the proposal is not subject to or adjoining a coastal marine area.	
<i>Regulation 52 – Rivers and lakes</i>	N/A – the proposal will not take place over a river or lake.	
<i>Subpart 6 – Earthworks</i>		
<i>Regulation 53 – Earthworks associated with certain antennas</i>	N/A – the proposal is not regulated activity under regulation 30, 32 or 34.	
<i>Regulation 54 – Earthworks: regional rules apply.</i> <i>(1) This regulation applies to a regulated activity if it includes earthworks (as referred to in regulation 5(1)(d)).</i> <i>(2) This regulation is complied with if the earthworks are carried out in accordance with any applicable regional rules about earthworks.</i>	N/A – There are no relevant rules in the Otago Regional Plan. The earthworks are of a small scale, and are not close to any marine or freshwater environment, and it is not on any known contaminated land.	
<i>Subpart 7 – Radiofrequency fields</i>		

Regulation	Compliance	Non-compliance
<i>Regulation 55 – Radiofrequency fields</i> <i>(1) This regulation applies to an RFG facility.</i> <i>(2) This regulation is complied with if-</i> <i>(a) the facility is installed and operated in accordance with NZS 2772.1; and</i> <i>(b) before the facility becomes operational, the facility operator gives the local authority—</i> <i>(i) written or electronic notice of the facility’s location; and</i> <i>(ii) a pre-commencement report that complies with subclause (3); and</i> <i>(c) either—</i> <i>(i) the facility operator gives the local authority a post-commencement report that complies with subclause (4) within 3 months after the facility becomes operational; or</i> <i>(ii) under subclause (5), the facility operator is not required to give a post-commencement report</i> <i>(3) A pre-commencement report must-</i> <i>(a) be prepared in accordance with AS/NZS 2772.2; and</i> <i>(b) take into account exposures arising from other telecommunication facilities in the vicinity of the facility; and</i> <i>(c) predict whether the radiofrequency field levels at places in the vicinity of the facility that are reasonably accessible to the general public will comply with NZS 2772.1</i> <i>(4) A post-commencement report must—</i> <i>(a) be prepared in accordance with AS/NZS 2772.2; and</i> <i>(b) provide evidence that the actual radiofrequency field levels at places in the vicinity of the facility that are reasonably accessible to the general public comply with NZS 2772.1</i>	Applies – the proposed facility is an RFG facility. Met. A pre-commencement report is provided in Appendix C, confirming that the proposal is installed and operated in accordance with NZS 2772.1. The pre-commencement report also confirms that 2degrees will provide a post-commencement report that complies with regulation 55(4) within 3 months of the upgrade becoming operational. Met. Refer to Appendix C for details. Met. The RF letter (Appendix C) confirms that a post-commencement report will be provided.	

Regulation	Compliance	Non-compliance
(5) <i>The facility operator is not required to give a post-commencement report if the prediction referred to in subclause (3)(c) was that the radiofrequency field levels will not reach 25% of the maximum level authorised by NZS 2772.1 for exposure of the general public</i>	N/A – as above, a post-commencement report will be provided.	



Appendix F Rules Assessment - 2nd Generation Dunedin City District Plan (2GP)

Resource Consent Application

**Roadside Telecommunication Facility Upgrade, opposite 12A Silverton Street,
Andersons Bay**

Two Degrees Networks Limited

SLR Project No.: 810.V16399.00001

12 August 2025

Rules assessment

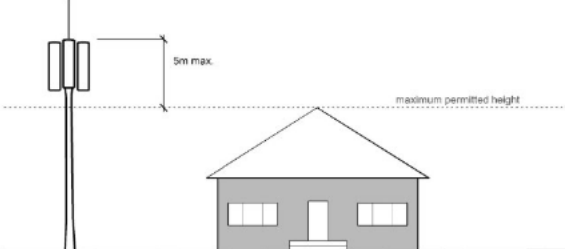
The following rules assessment has determined that resource consent is required for a **restricted discretionary activity** under the 2GP. Note that only those rules and standards which are relevant to this application have been addressed.

The proposal does not meet the definition of 'Operation, repair, minor upgrading and maintenance of existing network utilities' under the 2GP. Furthermore, under the 2GP, "Network utility structures – small scale consists of: • lines; and • network utility structures that do not exceed the scale thresholds in Rule 5.5.3." The proposed headframe exceeds the scale thresholds of head arrays³. Pursuant to Rule 5.5.3.2, network utility structures that exceed these thresholds are treated as large scale.

Rule/Standards	Comments
B. City-wide Activities – 5. Network Utilities	
Rule 5.3 Activity Status <u>5.3.2 Activity status table — Network utility activities</u> <u>Network utility structures - small scale</u> 6. Network utility poles and masts - small scale a. Res and Rec – Restricted discretionary activity	N/A – the assessment below confirmed that the proposed pole and headframe will be treated as large scale network utility structures.
10. All other network utility structures - small scale a. Res and Rec – Permitted activity Performance standards: i. Location ii. Scale thresholds iii. Maximum volume in PPF, SPF, HP and SHS iv. Technical standards v. Clearance from navigable water body	The proposed cabinets are within the scale thresholds in Rule 5.5.3 and comply with all relevant standards in Rule 5.5 (as assessed below) and therefore, are a permitted activity .
Network utility structures - large scale 16. All other network utility structures - large scale a. Res and Rec – Restricted discretionary activity	The proposed pole and headframe are treated as large scale network utility. Consent is required for restricted discretionary activity.
Rule 5.5 Network Utility Activities Performance Standards <u>5.5.1 Light Spill</u> The operation, repair, minor upgrading and maintenance of existing network utilities must comply with Rule 9.3.5.	N/A – the proposed facility does not have lights.
<u>5.5.2 Location</u> 1. Network utility structures - small scale must co-locate against ¹ a building or be attached to a network utility pole or mast if:	N/A – not relevant to the proposal. The location of the facility does not adjoin a primary pedestrian street frontage mapped area. The site is not within the

³ Under the definition in the 2GP, 'head arrays' means "an array of antennas attached to a mast. For the sake of clarity, this includes any mounting support structures." As per the definition, the proposed headframe is a head array under the 2GP.

Rule/Standards	Comments										
a. <i>within an area of road reserve that adjoins a primary pedestrian street frontage mapped area;</i> b. <i>within a heritage precinct and visible from an adjoining public place; or</i> c. <i>over 0.5m² in area or 500mm in height, located in a Natural Coastal Character Overlay Zone (NCC), visible from an adjoining public place, and located on the seaward side of a coastal road.</i> 2. Pipes... 3. In a heritage precinct,... 4. Network utility structures - small scale located on outstanding natural features...	natural or cultural precincts listed in this rule.										
5.5.3 Scale Thresholds 1. The following network utility structures are always considered network utility structures - small scale: a. Lines. 2. All other network utility structures must not exceed the scale thresholds set out in Rules 5.5.3.3 to 5.5.3.8 to be considered small scale. Network utility structures that exceed these thresholds are treated as large scale.	N/A – not relevant to the proposal.										
5.5.3.6 Network utility poles and masts - small scale thresholds <table><tr><td>Dimension</td><td>Scale threshold – i. Res, Rec</td></tr><tr><td>a. Diameter of head arrays</td><td>0.8m</td></tr><tr><td>c. Maximum area of largest antenna face (excluding dish antennas)</td><td>1.5m²</td></tr><tr><td>d. Maximum height</td><td>The greater of 1. 25m in the rural, rural residential and industrial zones; or 5m over the maximum height for buildings and structures in the zone in which the activity is located in all other zones (see Figure 5.5.3.6A); or 2. the height required to meet the safety clearance requirements of the New Zealand Electrical Code of Practice for Electrical Distances (NZECP34).</td></tr><tr><td>g. Cross sectional area of all other poles and masts (excluding any associated cross arms).</td><td>2m²</td></tr></table> i. Network utility poles and masts that exceed these thresholds are treated as network utility structures - large scale.	Dimension	Scale threshold – i. Res, Rec	a. Diameter of head arrays	0.8m	c. Maximum area of largest antenna face (excluding dish antennas)	1.5m ²	d. Maximum height	The greater of 1. 25m in the rural, rural residential and industrial zones; or 5m over the maximum height for buildings and structures in the zone in which the activity is located in all other zones (see Figure 5.5.3.6A); or 2. the height required to meet the safety clearance requirements of the New Zealand Electrical Code of Practice for Electrical Distances (NZECP34).	g. Cross sectional area of all other poles and masts (excluding any associated cross arms).	2m ²	Does not comply. The proposed facility contains a 1.05m wide headframe and therefore cannot comply with the scale thresholds in (a). Subclause (c) is not complied with as one of proposed antennas, measuring 2.55 m(h) x 0.749 m(w) x 0.226 m(d), will be approximately 1.9m² in area. Subclause (d) is not complied with, as assessed below in 5.5.3.6A and underlying zone provisions. Subclause (g) is complied with as the proposed pole is 0.49m in diameter and therefore the cross sectional area of the pole will be approximately 0.19m², which is less than 2m². According to the subclause (i), the proposed facility will be assessed as network utility structures – large scale under the 2GP.
Dimension	Scale threshold – i. Res, Rec										
a. Diameter of head arrays	0.8m										
c. Maximum area of largest antenna face (excluding dish antennas)	1.5m ²										
d. Maximum height	The greater of 1. 25m in the rural, rural residential and industrial zones; or 5m over the maximum height for buildings and structures in the zone in which the activity is located in all other zones (see Figure 5.5.3.6A); or 2. the height required to meet the safety clearance requirements of the New Zealand Electrical Code of Practice for Electrical Distances (NZECP34).										
g. Cross sectional area of all other poles and masts (excluding any associated cross arms).	2m ²										

Rule/Standards	Comments						
Note 5.5.3.6A - Other requirements outside of the District Plan 1. Under the Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016 (NESTF), activities provided for under the NESTF are exempt from any scale thresholds in Rule 5.5.3.6 that are more restrictive than the NESTF, except in ONF, HNCC, ONCC, NCC, SNL and ONL overlay zones, in heritage precincts and on scheduled heritage sites. Figure 5.5.3.6A: Maximum height of new poles or masts in all zones except the rural, rural residential and industrial zones 	The site is not in the rural, rural residential or industrial zones; and there will be a new pole erected in the proposed location to replace the existing pole, the relevant rules for 'new poles' in Rule 5.5.3.6A applies. The relevant underlying zone provision is listed and assessed below. According to the 2GP, the maximum height of new poles/mast can be up to 14m in this instance. The proposed facility will be 18.0m in height, exceeding the maximum allowable height by 4m.						
Rule 5.5.3.8 All other network utility structures - small scale thresholds a. Network utility structures – freestanding <table border="1"> <thead> <tr> <th>Dimension</th><th>Scale threshold – all zones</th></tr> </thead> <tbody> <tr> <td>i. Height</td><td>4m</td></tr> <tr> <td>ii. Area of footprint</td><td>5m²</td></tr> </tbody> </table>	Dimension	Scale threshold – all zones	i. Height	4m	ii. Area of footprint	5m ²	Complies. The replacement cabinets are to be assessed as freestanding network utility structures. Each of the cabinets measures 1.605m (h) x 0.7m (w) x 0.75m (d) and therefore will not exceed 4m in height and 5m² in area.
Dimension	Scale threshold – all zones						
i. Height	4m						
ii. Area of footprint	5m ²						
<u>5.5.4 Maximum Volume in Pedestrian Street Frontage mapped areas. Heritage Precincts and Scheduled Heritage Sites</u>	N/A – not relevant to the proposal.						
<u>5.5.5 Clearance from Navigable Water Body</u>	N/A – not relevant to the proposal.						
<u>5.5.6 Noise</u> All network utility activities must comply with Rule 9.3.6.	N/A – the proposal will comply with regulation 24 of the NESTF (as assessed in Appendix E) and therefore no further considerations under the 2GP is required.						
<u>5.5.7 Design Standards for Wind Generators</u>	N/A – not relevant to the proposal.						
<u>5.5.8 Site Coverage</u>	N/A – not relevant to the proposal.						
<u>5.5.9 Setbacks</u>	N/A – not relevant to the proposal.						
<u>5.5.10 Technical Standards</u>	N/A – not relevant to the proposal.						
<u>5.5.11 Maximum Height</u>	N/A – not relevant to the proposal.						
<u>5.5.12 Maximum Duration, Frequency, and Hours of Operation - to be added {Change TA4}</u>	N/A – not relevant to the proposal.						
D. Management Zones – 15. Residential Zones							
15.6.6.2 Maximum height	Does not comply.						

Rule/Standards		Comments
<i>a. New buildings, new structures, and additions and alterations must not exceed the following maximum height above ground level</i>		The underlying zone is General Residential 2 Zone. Under the zone provisions, the maximum permitted height for new buildings/structures in the General Residential 2 Zone is 9m. As such, the maximum height of new poles/mast in General Residential 2 Zone can be up to 14m in height under Rule 5.5.3.6A. The proposed facility will be 18.0m in height, exceeding the maximum allowable height by 4m.
	2. Maximum height in all other residential zones	
iv. All other new buildings, new structures, and additions and alterations	9m	



Appendix G Existing Consents

Resource Consent Application

**Roadside Telecommunication Facility Upgrade, opposite 12A Silverton Street,
Andersons Bay**

Two Degrees Networks Limited

SLR Project No.: 810.V16399.00001

12 August 2025

3 December 2020

2degrees Networks Limited
C/- Fiona Lilley
49 George Street
Newmarket
Auckland 1023

Via email: [REDACTED]

Dear Fiona

RESOURCE CONSENT APPLICATION:

**LUC-2020-585
ROAD RESERVE AT THE INTERSECTION OF
SILVERTON AND SOMERVILLE STREETS, AND
MUSSELBURGH RISE
DUNEDIN**

Your application for resource consent was processed on a non-notified basis in accordance with sections 95A to 95G of the Resource Management Act 1991. The application was considered by a Senior Planner, under delegated authority, on 3 December 2020.

The controlled activity land use consent qualified as a fast-track application and was accordingly processed in accordance with sections 87AAC and 87AAD of the Resource Management Act 1991.

The Council has granted consent to the application with conditions. The assessment of the application, including the reasons for the decision, is set out in the report attached to this letter. The consent certificate is attached to the rear of this letter.

The consent certificate outlines the conditions that apply to your proposal. Please ensure that you have read and understand all of the consent conditions.

You may object to this decision or any condition within 15 working days of the decision being received, by applying in writing to the Dunedin City Council at the following address:

Senior Planner - Enquiries
Dunedin City Council
PO Box 5045
Dunedin 9054

You may request that the objection be considered by a hearings commissioner. The Council will then delegate its functions, powers and duties to an independent hearings commissioner to consider and decide the objection. Please note that you may be required to pay for the full costs of the independent hearings commissioner.

Alternatively, there may be appeal rights to the Environment Court. Please refer to section 120 of the Resource Management Act 1991. It is recommended that you consult a lawyer if you are considering this option.

You will be contacted in due course if you are due a partial refund or you have to pay additional costs for the processing of your application.

Please feel free to contact me if you have any questions.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Jm Grey', with a stylized flourish at the end.

Jeremy Grey
Planner

APPLICATION LUC-2020-585: ROAD RESERVE AT THE INTERSECTION OF SILVERTON AND SOMERVILLE STREETS, AND MUSSELBURGH RISE, DUNEDIN

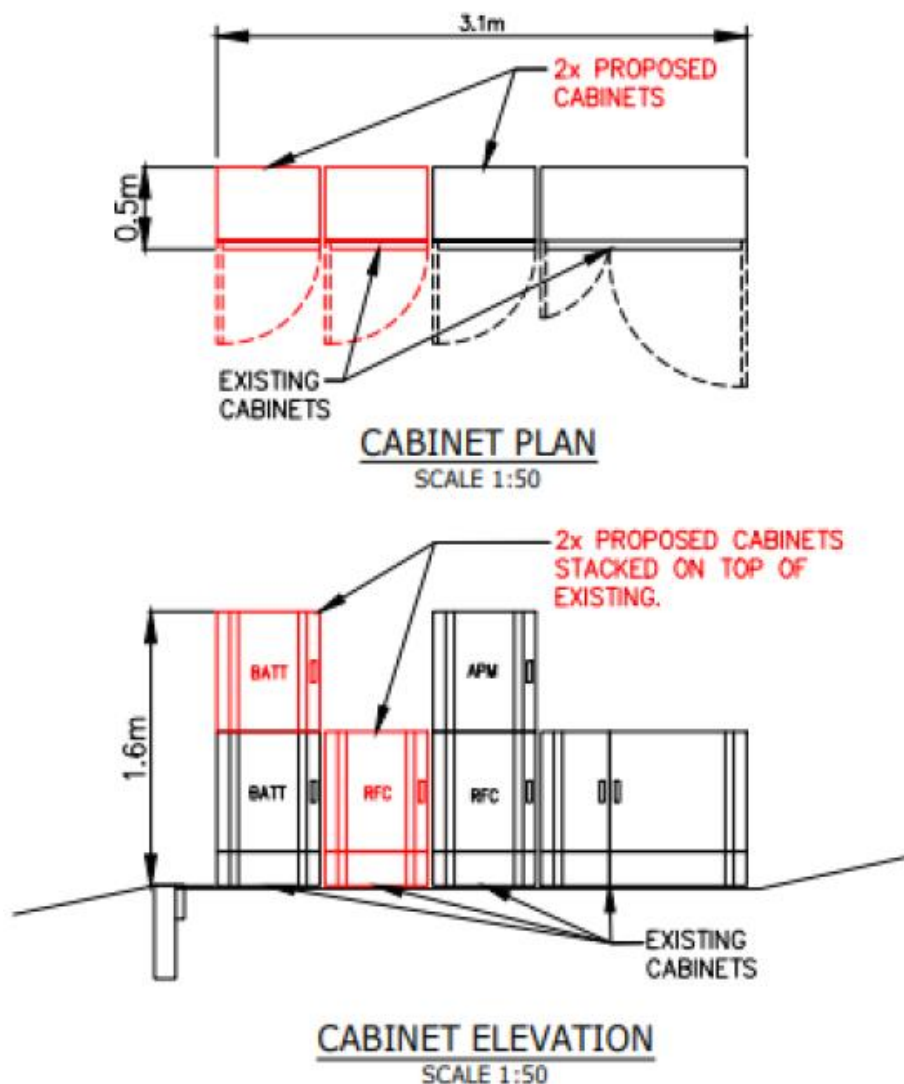
Department: Resource Consents

BACKGROUND

The applicant's existing cellular telecommunications facility has existed on the 'site' for approximately 9 years, after having been authorised via Certificate of Compliance COC-2011-20, issued in August 2011. The facility comprises a monopole and an associated group of four cabinets.

DESCRIPTION OF ACTIVITY

Resource consent is sought upgrade, operate and maintain the existing telecommunications facility on the site. Specifically, this involves adding two additional cabinets to the existing group. The two additional cabinets, annotated as "BATT" and "APW" will be stacked on top of the existing group, as per the applicant's figure below (please note, the red colour does not indicate existing or new cabinets and is not relevant):



The overall proposed height of the cabinet group will be 1.6m and the respective areas of the new cabinets will be 0.288m². As the two cabinets will be stacked on top of the existing cabinet group, the footprint of the set will remain unchanged at 1.55m². The applicant's group of cabinets is approximately 3m to the southwest of another group of cabinets operated by Vodafone.

The subject 'site' is legally described as road reserve and constitutes a relatively large traffic island that enables the control of the intersection between Silverton and Somerville Streets, as well as Musselburgh Rise.

REASONS FOR APPLICATION

NESTF

The Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016 (NESTF) provides for the deployment and operation of telecommunications infrastructure across New Zealand and have been in effect since January 2017. The NESTF supersedes certain district plan rules relating to the radio frequency fields of telecommunications facilities, the upgrading of existing facilities and the establishment of new facilities, regardless of zone.

The subject 'site' is located with a residential zone. As such, Regulation 20(3) of the NESTF is relevant and is as follows:

*The **height, footprint, and grouping rules** are as follows:*

- (a) if the cabinet is in a road reserve that is in, or adjoins, a residential zone,—*
 - (i) the height of the cabinet must not be more than 1.8 m; and*
 - (ii) the footprint of the cabinet must not be more than 1.4 m²; and*
 - (iii) the group rules in regulation 22 must be complied with (subject to regulation 23):*

The proposal will comply with (i) and (ii) above, but fails to comply with Regulation 22, which is as follows:

The group rules for a cabinet in a road reserve are that, at the time a cabinet is installed,—

- (a) the cabinet must be—*
 - (i) at least 30 m away from any other cabinet that is on the same side of the road; or*
 - (ii) in a group of cabinets; and*
 - (b) if the cabinet is in a group,—*
 - (i) each cabinet in the group must be at least 30 m away from any cabinet that is on the same side of the road and is not in the group; and*
 - (ii) the total footprint of all cabinets in the group must not be more than 2m².*
- (2) Two or more cabinets are in a group if the distance between each cabinet and the one nearest to it is not more than 0.5 m.*

The cabinets can be considered to comprise a group, pursuant to (2) above. However, while the group of cabinets will have a total footprint of less than 2m², they will be closer than 30m from the Vodafone group of cabinets, breaching the regulation. Regulation 23 is not relevant.

Regulation 14 of the NESTF is as follows:

- (1) A regulated activity is a controlled activity if—*
 - (a) it is carried out not in accordance with the standard; and*
 - (b) under the relevant district plan or proposed district plan, it is a permitted activity or controlled activity.*

Dunedin currently has two district plans: the Operative Dunedin City District Plan 2006 (the “Operative District Plan”, and the Proposed Second Generation Dunedin City District Plan (the “Proposed 2GP”). Until the Proposed 2GP is made fully operative, both district plans need to be considered in determining the activity status and deciding what aspects of the activity require resource consent.

The activity status of the application is fixed by the provisions in place when the application was first lodged, pursuant to section 88A of the Resource Management Act 1991. However, it is the provisions of both district plans in force at the time of the decision that must be had regard to when assessing the application.

The relevant rules of ODP have been assessed against the corresponding rules of the Proposed 2GP. None of relevant rules of the Proposed 2GP are subject to any appeals. As such, this application has been assessed on the basis that the rules of the ODP are deemed inoperative and only the rules of the 2GP have been used in this assessment.

Under the Proposed 2GP, the proposal is assessed as a permitted activity, pursuant to Rule 5.5.3.8.a. Therefore, the proposal must be assessed as a **controlled activity**, pursuant to Regulation 14(1). In respect of the assessment of the proposal, Regulation 14(2) provides the following guidance:

(2) For the purposes of section 87A(2)(b) of the Act, control is reserved over the subject matter of each regulation (or component of a regulation)—
(a) compliance with which is part of the standard; and
(b) that is not complied with.

All other relevant regulations of the NESTF will be satisfied.

There are no National Environmental Standards relevant to this application, other than the NESTF.

WRITTEN APPROVALS AND EFFECTS ASSESSMENT

Affected Persons

No affected persons forms were submitted with the application. No person or party is considered to be adversely affected by the activity. This is because the environmental effects of the proposal are limited to effects on parties that are less than minor.

Effects on the Environment

Permitted Baseline

Under sections 95D(b) and 104(2) of the Resource Management Act 1991, the Council may disregard an adverse effect of the activity on the environment if the district plan or a national environmental standard permits an activity with that effect.

This is the permitted baseline. In this situation, the proposal could be undertaken as of right if the Vodafone cabinets were either 30m distant or were not present at all.

It is considered that this is the appropriate baseline against which the activity should be considered. As a result, it is the effects arising from the proposal, beyond the permitted baseline, that are the crucial elements for consideration.

Receiving Environment

The existing and reasonably foreseeable receiving environment is made up of:

- The existing environment and associated effects from lawfully established activities;

- Effects from any consents on the subject site (not impacted by proposal) that are likely to be implemented;
- The existing environment as modified by any resource consents granted and likely to be implemented; and
- The environment as likely to be modified by activities permitted in the district plan.

For the subject site, the existing and reasonably foreseeable receiving environment comprises a large traffic island, containing grass and some mature trees, surrounding by arterial roads.

For adjacent land, the existing and reasonably foreseeable receiving environment mainly comprises a long-established residential suburb, along with a public reserve area to the west.

It is against these that the effects of the activity, beyond the permitted baseline, must be measured.

Assessment

Consideration is required of the relevant assessment criteria, as determined by the NESTF. This assessment is limited to the matters to which the Council's control has been reserved. No regard has been given to any trade competition or any effects of trade competition.

The applicant has provided an assessment of effects that is commensurate with the scale of the activity. I generally agree with this assessment and its conclusions. Notwithstanding the close proximity of the applicant's cabinet group with that of Vodafone, I consider that in this context, it is less visually intrusive to have the two groups clustered together, as is currently the case. This is so both from an amenity perspective as well as from a transport safety perspective. The current location of the applicant's cabinet group means that visual obstruction for motorists at adjacent intersections is minimised, which will remain so after the proposed cabinets are added. In terms of amenity, the location of both groups of cabinets adjacent to the mature tree affords an effective degree of visual mitigation. In a scenario where the tree ceases to exist, it is my opinion that it would be of greater benefit for the two cabinet groups to be clustered, rather than not. The application also notes that the two additional cabinets will be finished in a colour that matches the existing infrastructure, resulting in additional visual mitigation.

On this basis, I anticipate that any resulting adverse effects will be acceptable.

NOTIFICATION ASSESSMENT

Public Notification

Section 95A of the Resource Management Act 1991 sets out a step-by-step process for determining public notification. Each step is considered in turn below.

Step 1: Mandatory public notification in certain circumstances

- Public notification has not been requested.
- There has been no failure or refusal to provide further information.
- There has been no failure to respond or refusal to a report commissioning request.
- The application does not involve the exchange of recreation reserve land.

Step 2: If not required by Step 1, public notification precluded in certain circumstances

- There are no rules or national environmental standards precluding public notification.
- The application as a whole is for a controlled activity which by default is precluded from public notification.

Step 3: If not precluded by Step 2, public notification required in certain circumstances

- Step 3 does not apply because public notification is precluded under Step 2.

Step 4: Public notification in special circumstances

- There are no special circumstances that warrant the application being publicly notified. There is nothing exceptional or unusual about the application that makes public notification desirable.

Limited Notification

Section 95B of the Resource Management Act 1991 sets out a step-by-step process for determining limited notification. Each step is considered in turn below.

Step 1: Certain affected groups and affected persons must be notified

- The activity is not in a protected customary rights area; the activity is not an accommodated activity in a customary marine title area; and, the activity is not on or adjacent to, or might affect, land that is the subject of a statutory acknowledgement.

Step 2: If not required by Step 1, limited notification precluded in certain circumstances

- The application as a whole is for a controlled activity land use consent, and is by default precluded from limited notification.

Step 3: If not precluded by Step 2, certain other affected persons must be notified

- Step 3 does not apply because limited notification is precluded under Step 2.

Step 4: Further notification in special circumstances

- There are no special circumstances that warrant the application being limited notified. There is nothing exceptional or unusual about the application that makes limited notification to any other persons desirable.

SUBSTANTIVE DECISION ASSESSMENT**Effects**

In accordance with section 104(1)(a) of the Resource Management Act 1991, the actual and potential adverse effects associated with the proposed activity have been assessed and outlined above. It is considered that the adverse effects on the environment arising from the proposal are no more than minor.

Offsetting or Compensation Measures

In accordance with section 104(1)(ab) of the Resource Management Act 1991, there are no offsetting or compensation measures proposed or agreed to by the applicant that need consideration.

Objectives and Policies

In accordance with section 104(1)(b) of the Resource Management Act 1991, the objectives and policies of the Operative District Plan and the Proposed 2GP were taken into account when assessing the application.

Operative District Plan

The proposal is considered to be consistent with the following objectives and policies:

- **Objective 4.2.1 and Policy 4.3.1 (Sustainability Section)**
These seek to enhance and maintain the amenity values of the Dunedin area.
- **Objective 6.2.2 and Policy 6.3.5 (Rural Section)**
These seek to maintain and enhance the amenity values associated with the character of the rural area.
- **Objective 8.2.1 and Policy 8.3.1 (Residential Section)**
These seek to ensure that the adverse effects on the amenity values and character of residential areas are avoided remedied or mitigated.
- **Objective 20.2.1 and Policy 20.3.1 (Transportation Section)**
These seek to avoid, remedy or mitigate adverse effects on the environment arising from the use of the transportation network.
- **Objective 22.2.1 and Policy 22.3.1 (Utilities Section)**
These seek to provide for the safe and efficient use and development of utilities within the city by allowing the construction, operation and upgrading of those utilities which has no more than minor adverse effects.
- **Objective 22.2.2 and Policies 22.3.2, 22.3.3, 22.3.4 and 22.3.5 (Utilities Section)**
These seek to ensure that any adverse environmental effects of the construction, operation and upgrading of utilities in the City are avoided, remedied or mitigated.

Proposed 2GP

The proposal is considered to be consistent with the following Proposed 2GP objectives and policies:

- **Objective 5.2.1 and Policies 5.2.1.2, 5.2.1.5 and 5.2.1.6 (Network Utilities Section) (under appeal)**
These seek to ensure that any adverse environmental effects of the construction, operation and upgrading of utilities in the City are avoided, remedied or mitigated by ensuring utilities are designed and located to enable the provision of network utilities while avoiding or adequately mitigating adverse effects on the amenity and character of the zone and the amenity of any surrounding residential activities.
- **Objective 6.2.3 and Policies 6.2.3.3, 6.2.3.4 and 6.2.3.9 (Transportation Section)**
These seek to ensure that land use, development and subdivision activities maintain the safety and efficiency of the transport network for all travel methods.
- **Objective 15.2.3 and Policy 15.2.3.1 (Residential Zones)**
These seek to ensure that activities in residential zones maintain a good level of amenity on surrounding residential properties and public spaces.

Objectives and Policies Assessment

The decisions on the Proposed 2GP were released in November 2018 and this consent is being processed during the appeal period. As indicated above, an appeal has yet to be resolved, which is relevant to this proposal.

However, notwithstanding the unresolved, on balance the objectives and policies of the Proposed 2GP have been given more weight than those of the Operative District Plan, due to the late stage at which the Proposed 2GP is currently in the plan change process. In any case, the proposal is considered to be consistent with the relevant objectives and policies of both district plans, which support granting consent.

Other Matters

Having regard to section 104(1)(c) of the Resource Management Act 1991, no other matters are considered relevant.

Part 2

Based on the findings above, it is evident that the proposal would satisfy Part 2 of the Resource Management Act 1991. Granting of consent would promote the sustainable management of Dunedin's natural and physical resources.

RECOMMENDATION

After having regard to the above planning assessment, I recommend that:

1. This application be processed on a non-notified basis, pursuant to sections 95A and 95B of the Resource Management Act 1991.
2. The Council grant consent to the proposed activity under delegated authority, in accordance with sections 104 and 104A of the Resource Management Act 1991.



Jeremy Grey
Planner

Date: 3 December 2020

DECISION

I have read both the notification assessment and substantive decision assessment in this report. I agree with both recommendations above.

Under delegated authority on behalf of the Dunedin City Council, I accordingly approve the granting of resource consent to the proposal:

*Pursuant to Part 2 and sections 34A(1), 104 and 104A of the Resource Management Act 1991, and the provisions of the Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016, the Operative Dunedin City District Plan 2006 and the Proposed Second Generation Dunedin City District Plan, the Dunedin City Council **grants** consent to a **controlled activity** being the establishment of two addition cabinets to an existing cabinet group within Road Reserve at the Intersection of Silverton and Somerville Streets, and Musselburgh Rise, Dunedin, subject to the conditions imposed under section 108 of the Act, as shown on the attached certificate.*



Phil Marshall
Senior Planner

Date: 3 December 2020

Consent Type: Land Use Consent

Consent Number: LUC-2020-585

Purpose: The establishment of two addition cabinets to an existing cabinet group.

Location of Activity: Road Reserve at the Intersection of Silverton and Somerville Streets, and Musselburgh Rise, Dunedin.

Lapse Date: 3 December 2025, unless the consent has been given effect to before this date.

Conditions:

1. *The proposed activity must be undertaken in general accordance with the approved plans attached to this certificate as Appendix One, and the information provided with the resource consent application received by the Council on 20 November 2020.*
2. *The colour of the proposed cabinets must match the colour of the cabinets on top of which they are to be located.*

Advice Notes:

1. In addition to the conditions of a resource consent, the Resource Management Act 1991 establishes through sections 16 and 17 a duty for all persons to avoid unreasonable noise, and to avoid, remedy or mitigate any adverse effect created from an activity they undertake.
2. Resource consents are not personal property. The ability to exercise this consent is not restricted to the party who applied and/or paid for the consent application.
3. It is the responsibility of any party exercising this consent to comply with any conditions imposed on the resource consent prior to and during (as applicable) exercising the resource consent. Failure to comply with the conditions may result in prosecution, the penalties for which are outlined in section 339 of the Resource Management Act 1991.
4. The lapse period specified above may be extended on application to the Council pursuant to section 125 of the Resource Management Act 1991.

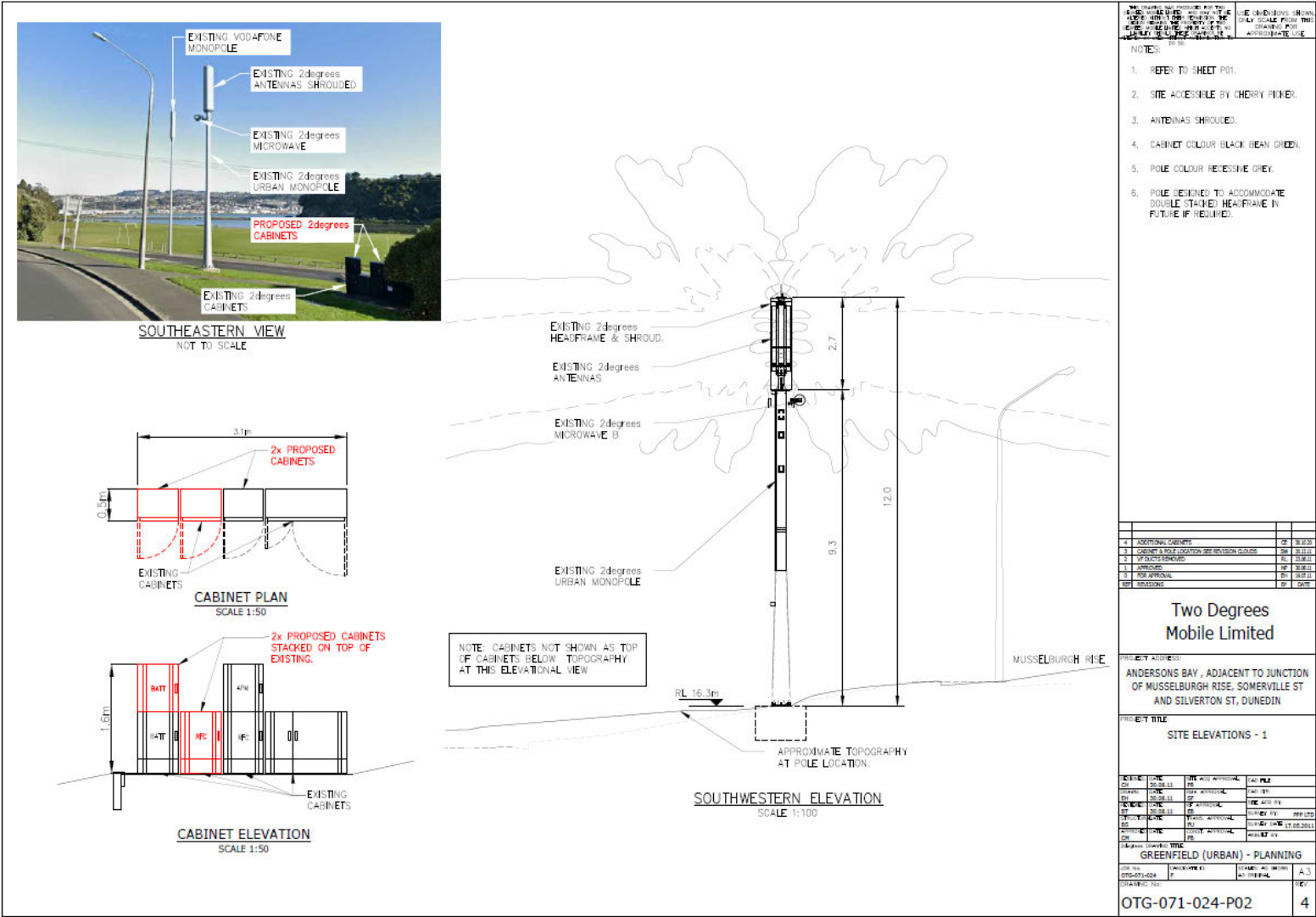
5. This is a resource consent. Please contact the Council's Building Services Department, about the building consent requirements for the work.

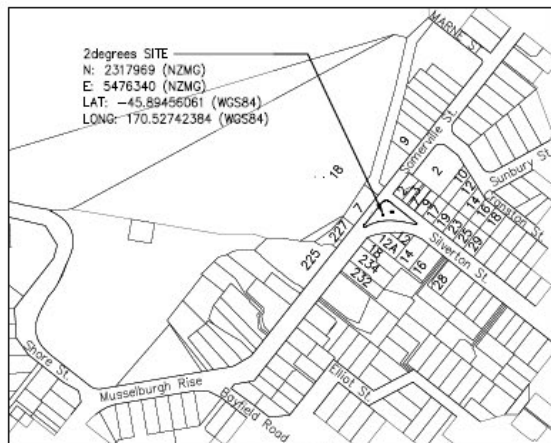
Issued at Dunedin this 3rd day of December 2020

A handwritten signature in black ink, appearing to read 'Jm Grey', written in a cursive style.

Jeremy Grey
Planner

Appendix One: Approved Plan/s for LUC-2020-585 (scanned image(s), not to scale)





LOCALITY MAP
SCALE 1:5000

LEGEND - EXISTING SERVICES	
— W —	WATER MAIN
— P —	POWER
— G —	GAS
— TC —	TELSTRA
— PO —	POWER (OVERHEAD)
— FO —	FIBRE OPTIC
— SW —	STORMWATER
— SS —	SANITARY SEWER
— T —	TELECOM
— HV —	HIGH VOLTAGE POWER

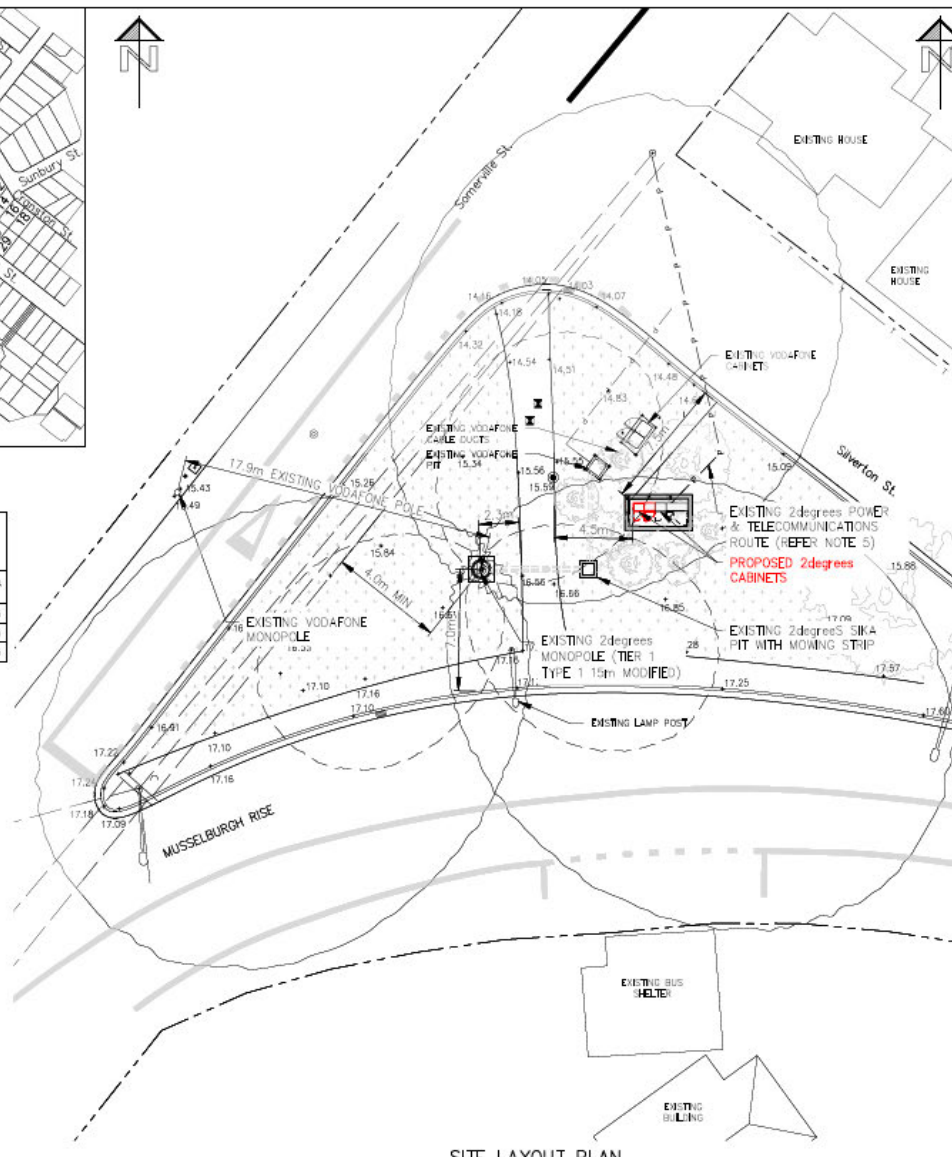
⊙ STORMWATER MANHOLE ☐ DRAINAGE GRATE
● SANITARY SEWER MANHOLE ✕ WATER TOSYBOX

EXISTING RF ANTENNA INFORMATION					
SECTOR	AZIMUTH (Deg)	ANTENNA HGT (m)	ANTENNA TYPE	FEEDER LENGTH (m)	FEEDER TYPE
SECTOR 1	30°	10.8	742 224_02	25	WFS-50
SECTOR 2	120°	10.8	742 224_02	25	WFS-50
SECTOR 3	230°	10.8	742 224_02	25	WFS-50

NOTE: ANTENNA AZIMUTH AND TYPE TO BE CONFIRMED BY 2degrees RF ENGINEER.
SITE TYPE "DU" IN LINE
ANTENNA DIMENSIONS(mm) KATHREIN 742 224_02 = 1933h x 261w x 146d
CABINET DIMENSIONS(mm): 1 x UTILITY (1200W x 4800 x 900H), 3 x RADIO (600W x 4800 x 900H). TOTAL FOOTPRINT (3090 x 480)



VODAFONE RF ANTENNA INFORMATION		
SECTOR	AZIMUTH (Deg)	ANTENNA TYPE
SECTOR 1	TBC	742 215
SECTOR 2	TBC	742 215
SECTOR 3	TBC	742 215



SITE LAYOUT PLAN
SCALE 1:250

USE DIMENSIONS SHOWN ONLY. SCALE FROM THIS DRAWING FOR APPROXIMATE USE.

1. ACCESS FROM PUBLIC ROAD - SOMERVILLE ST OR MUSSELBURGH RISE.
2. ANTENNA HEIGHTS ARE ABOVE GROUND LEVEL (APPROX.).
3. IT IS THE CONTRACTOR'S RESPONSIBILITY TO LOCATE AND PROTECT ALL EXISTING SERVICES IN THE VICINITY OF THE SITE (INCLUDING THOSE NOT NECESSARILY SHOWN) PRIOR TO COMMENCEMENT OF ANY WORKS ON SITE. SERVICES SHOWN ARE INDICATIVE ONLY.
4. ALL EXISTING SURFACES AND FEATURES FULLY REINSTATED TO THEIR ORIGINAL CONDITION.
5. ROUTE CONFIRMED ON SITE BETWEEN CONTRACTOR, OWNER, AND/OR AUTHORITY. REFER TO GREENFIELD E710 SERIES ELECTRICAL STANDARDS DRAWING FOR DETAILS. POWER SUPPLY FROM POWER POLE IN SILVERTON STREET APPROX. 200m AWAY. EARTHING/LIGHTING OPTION 1.
6. REFER TO 2degrees STD-0500 SERIES FOR SIGNS A, B, C, & D. (SELECT AS REQUIRED).
7. EXACT CABINET POSITION DETERMINED ON SITE DUE TO EXISTING SERVICES (WITH CONCRETE MOWING STRIP OF 200mm WIDE ON ALL SIDES & MARKED TO EXISTING SURFACES WHERE PRACTICAL). CABINET COLOUR TO BE BLACK BEAN GREEN. POLE COLOUR TO BE REFLECTIVE GREY.
8. ALL TYPE "DU" CABINETS HAVE 30mm GAP BETWEEN ADJACENT CABINETS.

4	ADDITIONAL CABINETS	OF	30/03/18
3	CABINET & POLE LOCATION SEE REVISION LOGS	SP	30/03/18
2	10' DUCTS REMOVED	RS	15/03/18
1	APPROVAL	OF	30/03/18
0	FOR APPROVAL	BY	30/03/18
0	REVISIONS	BY	DATE

Two Degrees Mobile Limited

PROJECT ADDRESS:
ANDERSONS BAY, ADJACENT TO JUNCTION
OF MUSSELBURGH RISE, SOMERVILLE ST
AND SILVERTON ST, DUNEDIN

PROJECT TITLE:
LOCALITY & SITE LAYOUT PLAN

DATE	DATE	DATE	DATE
30/03/18	30/03/18	30/03/18	30/03/18
30/03/18	30/03/18	30/03/18	30/03/18
30/03/18	30/03/18	30/03/18	30/03/18

2degrees (urban) - PLANNING
JOB NO: 075-071-024
DRAWING NO: A3

OTG-071-024-P01 4

7 October 2024

Two Degrees Networks Limited
Attention: Jo Li - SLR Consulting New Zealand Limited
201 Victoria Street West
Auckland 1010

Via email: [REDACTED]

Dear Jo,

RESOURCE CONSENT APPLICATION:

**LUC-2024-367
R SILVERTON STREET, DUNEDIN
(ROAD RESERVE AT THE INTERSECTION OF
SILVERTON AND SOMERVILLE STREETS, AND
MUSSELBURGH RISE)**

The Council has granted consent to your application for resource consent.

The assessment of the application, including the reasons for the decision, is set out in the report attached to this letter. The consent certificate is attached to the rear of this letter.

Consent Conditions

The consent certificate outlines the conditions that apply to your proposal. Please ensure that you have read and understand them.

Consent Processing Fees

You will be contacted soon if you are due a partial refund or you need to pay additional costs for the processing of your application.

Objection and Appeal Rights

You can object to this decision or any condition within 15 working days of the decision being received, by applying by email to planning@dcc.govt.nz, or in writing to the Dunedin City Council at the following address:

Senior Planner - Enquiries
Dunedin City Council
PO Box 5045
Dunedin 9054

You can request that the objection be considered by a hearings commissioner. The Council will then delegate its functions, powers and duties to an independent hearings commissioner to consider and decide

the objection. Please note that you might be required to pay for the full costs of the independent hearings commissioner.

Alternatively, there might be appeal rights to the Environment Court. Please refer to Section 120 of the Resource Management Act 1991. It is recommended that you consult a lawyer if you are considering this option.

Contact for any Questions

Please feel free to contact me if you have any questions.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Geraldine Bulatete'. The signature is stylized with a large, sweeping initial 'G' and a trailing flourish.

Geraldine Bulatete
Graduate Planner

APPLICATION LUC-2024-367: R SILVERTON STREET, DUNEDIN

Department: Resource Consents

BACKGROUND

A Certificate of Compliance COC-2011-20 was issued for establishment and operation of a cellular telecommunications facility located in the road reserve opposite 12A Silverton Street, Dunedin. Land use consent LUC-2020-585 was granted for a controlled activity being the addition of two cabinets to an existing cabinet group for the upgrade of this facility.

DESCRIPTION OF ACTIVITY

Resource consent is sought to upgrade an existing telecommunications facility noted above which comprises a monopole and associated group of cabinets. The proposed activity seeks to replace one existing 300mm microwave dish antenna with a new 413mm diameter microwave dish antenna, and to install an ancillary equipment comprising small electronic boxes adjacent to the proposed microwave dish.

The proposed antenna will be attached at a height of 9m on the existing monopole which measures 12m at its highest point (i.e., 9.24m high monopole combined with existing antennae mounted above it). The proposal will result in protrusion distance of 0.48m of the proposed antenna from the mounted bracket. No earthworks are proposed at this stage.

The subject 'site' is legally described as road reserve and constitutes a relatively large traffic island that enables the control of the intersection between Silverton and Somerville Streets, as well as Musselburgh Rise.

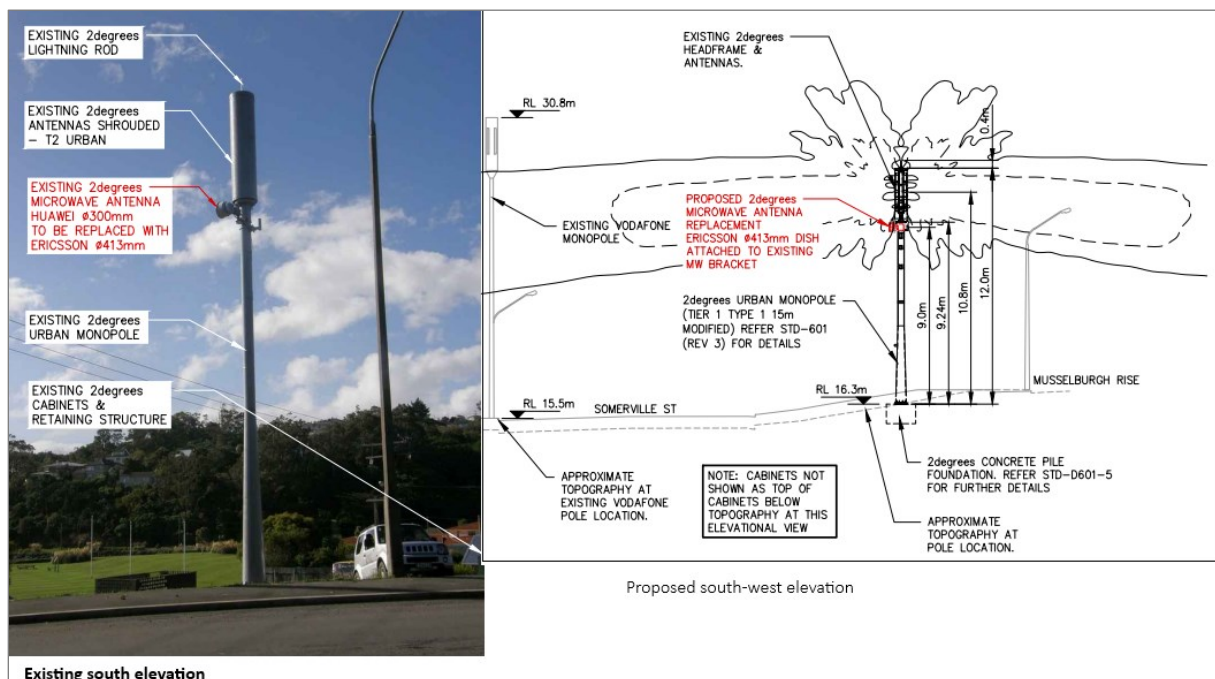


Figure 1: The existing telecommunications facility and proposed upgrade plan (Source LUC-2024-367 application)

REASONS FOR APPLICATION

National Environmental Standards for Telecommunication Facilities 2016 (NESTF)

The Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016 (NESTF) provides for the deployment and operation of telecommunications infrastructure across New Zealand. The NESTF supersedes certain District Plan rules relating to telecommunications radio frequency fields, the upgrading of existing facilities and also provides for regulated activities.

Regulation 5(1) of the NESTF identifies installing and operating a facility as an activity to which the NESTF applies including installing and operating the following:

- an antenna attached to a pole, the pole and any headframe, mount, or shroud;
- a cabinet, the equipment in the cabinet;
- the repair and maintenance of the facility; and
- earthworks associated with the activity.

Relevant aspects of the proposal are assessed in the application's AEE. This report confirms the proposal complies with the relevant regulations of the NESTF, except the following:

- **Regulation 27** which relates to the width(s) of the antennas on existing pole in road reserve. The proposal is to replace one existing microwave dish antenna which is 0.3m in diameter with a new 0.413m diameter microwave dish antenna. Regulation 27(4)(a) requires a diameter for a replacement dish antenna to not exceed 0.38m.
Regulation 27(4)(b) requires a protrusion distance of no more than 0.6m for a replacement dish antenna. The proposal will result in protrusion distance of generally 0.48m from the mounted bracket to the outer edge of the upgraded microwave dish. However, the application states that due to the azimuth of the dish, the total protrusion distance may exceed the permitted 0.6m distance by a negligible amount.

Regulation 55 applies to an RFG facility and its compliance with NZS 2772.1, which specifies limits of exposure of the general public to radiofrequency radiation intended to avoid biological effects hazardous to the human body. A certificate of compliance COC-2011-20 was obtained on 3 August 2011 which confirms that the existing facility operator complies with this regulation. As there is no change proposed at this stage in the radio-frequency fields maximum exposure level, compliance with regulation 55 is therefore maintained and no further assessment is required.

In summary, the proposal is a **controlled activity** pursuant to Regulation 14(1) of the NESTF as it does not comply with Regulation 27 but is a permitted activity under the provisions of the Partially Operative Dunedin City Second Generation District Plan 2024.

Under Regulation 14(2), control is reserved as follows:

For the purposes of section 87A(2)(b) of the Act, control is reserved over the subject matter of each regulation (or component of a regulation)-

- (a) compliance with which is part of the standard; and*
- (b) that is not complied with.*

In this case, this relates to an antenna attached on an existing pole in road reserve, whose diameter is more than 0.38m and a protrusion distance of more than 0.6m

There are no other National Environmental Standards relevant to this application.

Partially Operative Dunedin City Second Generation District Plan 2024 (the “2GP”)

Dunedin currently has two district plans: the Operative Dunedin City District Plan 2006 (the “District Plan 2006”, and the Proposed Dunedin City Second Generation District Plan. On 19 August 2024, the Proposed Dunedin City Second Generation District Plan became partially operative and now supersedes the District Plan 2006, except for limited specific provisions and identified areas that are still subject to appeal. Where these provisions and appeals are relevant, the District Plan 2006 must still be considered.

In this instance, there are no relevant appeals, and this application has been processed with reference to the 2GP only.

The subject site is zoned General Residential 2, and is subject to Variation 2 Mapped Area overlay. Silverton Street and Musselburgh Rise are classified as ‘Urban High Density Corridor’ in the Plans Roding Hierarchy, and Somerville Street is a ‘Collector’ road.

The Proposed 2GP was notified on 26 September 2015, and some Proposed 2GP rules had immediate legal effect from this date. Some rules became fully operative following the close of submissions, where no submissions were received. Additional rules came into legal effect upon the release of decisions. Those additional rules become fully operative if no appeals are lodged or once any appeals have been resolved.

Proposed Land Use

The proposal falls under the definition of the following city-wide activity:

Network utilities – Any systems, services and networks associated with:

- *the investigation and generation of electricity, and of other forms of energy such as heat*
- *the transmission and distribution of electricity, and of other forms of energy such as hot water or steam*
- *municipal and domestic water, wastewater and stormwater supply, treatment and drainage*
- *the storage, transmission and distribution of natural or manufactured gas, petroleum, biofuel, or geothermal energy*
- **telecommunications and radiocommunication**
- *navigational aids*
- *meteorological facilities*
- *air quality monitoring facilities; and*
- *river flow recording facilities.*

Consequently, only the city-wide activities rules and performance standards under Section 5 of the 2GP need consideration.

As outlined in Rule 5.3.1(5)(e), activities such as new antennas on existing poles are to be managed via the regulations in the NESTF (except in certain circumstances where the NESTF refers to provisions in the district plan). This report acknowledges that the NESTF refers the proposal to the 2GP via Regulations 14 (Controlled activity), but does not refer this proposal to the 2GP in the relevant Regulation 27 for antenna on existing pole in road reserve.

The proposal is considered ‘All other small-scale network utility structures’ defined in the 2GP as “network utility structures consist of lines and network utility structures that do not exceed the scale thresholds in Rule 5.5.3. In this case, Rule 5.5.3.6(b) applies whereby, the diameter of dish antenna must not exceed 1.2m. The proposed replacement dish antenna will have a diameter of 0.413m therefore, the proposal is a permitted activity under Rule 5.3.2(10).

Overall Status

Where an activity requires resource consent under more than one rule, and the effects of the activity are inextricably linked, the general principle from case law is that the different components should be bundled and the most restrictive activity classification applied to the whole proposal.

In this case, the proposal is a **controlled activity** as described above, under the NESTF.

WRITTEN APPROVALS AND EFFECTS ASSESSMENT

Affected Persons

No affected persons forms were submitted with the application. No person or party is considered to be adversely affected by the activity. This is because the environmental effects of the proposal are limited to effects on parties that are less than minor.

Effects on the Environment

Permitted Baseline

Under sections 95D(b) and 104(2) of the Resource Management Act 1991, the Council may disregard an adverse effect of the activity on the environment if the district plan or a national environmental standard permits an activity with that effect. This is the permitted baseline.

In this situation, it comprises a similar proposal that has antenna no more than 0.38m in diameter and may protrude to a distance no more than 0.6m.

It is considered that this is the appropriate baseline against which the activity should be considered. As a result, it is the effects arising from the proposal, beyond the permitted baseline, that are the crucial elements for consideration.

Receiving Environment

The existing and reasonably foreseeable receiving environment is made up of:

- The existing environment and associated effects from lawfully established activities;
- Effects from any consents on the subject site (not impacted by proposal) that are likely to be implemented;
- The existing environment as modified by any resource consents granted and likely to be implemented; and
- The environment as likely to be modified by activities permitted in the district plan.

For the subject site, the existing and reasonably foreseeable receiving environment comprises a large traffic island, containing grass and some mature trees, surrounding by arterial roads.

For adjacent land, the existing and reasonably foreseeable receiving environment mainly comprises a long-established residential suburb, along with a public reserve area to the west.

It is against these that the effects of the activity, beyond the permitted baseline, must be measured.

Assessment Matters/Rules

Consideration is required of the relevant assessment rules in the 2GP, along with the matters in any relevant national environmental standard. This assessment is limited to the matters to which the Council's control has been reserved. No regard has been given to any trade competition or any effects of trade competition.

1. NESTF Regulations 14(2)(a) compliance with which is part of the standard; and 14(2)(b) that is not complied with

In this case, the NESTF requires that the antennas on existing poles located in the road reserve are no more than 0.38m in diameter and may protrude to a distance no more than 0.6m. The proposal will contravene this standard by approximately 0.033m in diameter, with protrusion distance from 0.48m to more than 0.6m, but only negligibly. As shown in Figure 3 below, the proposed replacement microwave dish will be attached below the existing headframe and shrouded antennae.

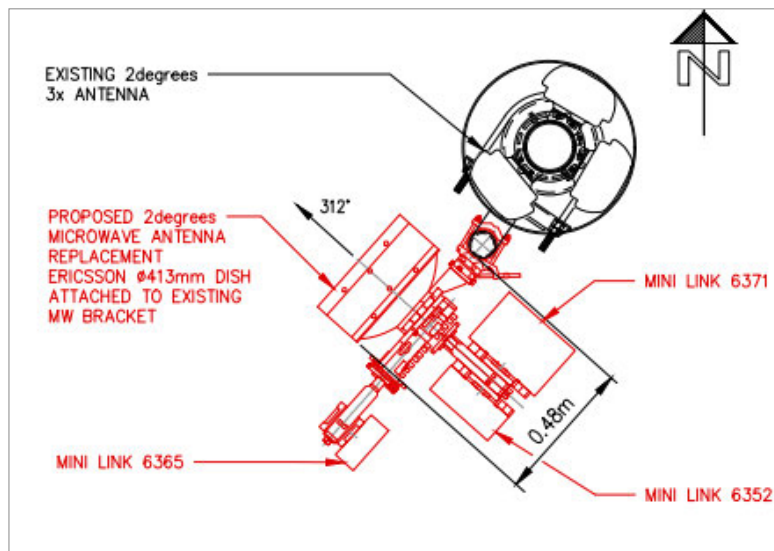


Figure 2: Proposed microwave plan (Source LUC-2024-367 application)



Figure 3: South perspective image of the existing and proposed activity from application

The applicant has provided an assessment of effects on visual amenity including positive effects to the existing telecommunications facility. I generally agree with this assessment and its conclusions. The additional size of the diameter of the new microwave dish and its protrusion distance from the mounted bracket to its outer edge will be comparatively negligible relative to the existing facility. Consequently, the proposed changes will not readily be noticeable from surrounding viewpoints. As such, it is considered the proposal will generally appear as a 'like-for-like' replacement from an amenity perspective. No additional cabinetry is proposed, so there are no concerns from a pedestrian or transport safety perspective. The application also notes that the upgraded antenna will be the same recessive colours as the existing antenna resulting in additional visual mitigation. The benefits of the proposed upgrade identified in the application are not considered overstated.

On this basis, I anticipate that any resulting adverse effects will be acceptable.

NOTIFICATION ASSESSMENT

Public Notification

Section 95A of the Resource Management Act 1991 sets out a step-by-step process for determining public notification. Each step is considered in turn below.

Step 1: Mandatory public notification in certain circumstances

- Public notification has not been requested.
- There has been no failure or refusal to provide further information.
- There has been no failure to respond or refusal to a report commissioning request.
- The application does not involve the exchange of recreation reserve land.

Step 2: If not required by Step 1, public notification precluded in certain circumstances

- There are no rules or national environmental standards precluding public notification.
- The application does not involve: a controlled activity, nor a boundary activity. As a result, public notification is not precluded under Step 2.

Step 3: If not precluded by Step 2, public notification required in certain circumstances

- There are no rules or national environmental standards requiring public notification.
- The activity will not have, or be likely to have, adverse effects on the environment that are more than minor.

Step 4: Public notification in special circumstances

- There are no special circumstances that warrant the application being publicly notified. There is nothing exceptional or unusual about the application that makes public notification desirable.

Limited Notification

Section 95B of the Resource Management Act 1991 sets out a step-by-step process for determining limited notification. Each step is considered in turn below.

Step 1: Certain affected groups and affected persons must be notified.

- The activity is not in a protected customary rights area; the activity is not an accommodated activity in a customary marine title area; and, the activity is not on or adjacent to, or might affect, land that is the subject of a statutory acknowledgement.

Step 2: If not required by Step 1, limited notification precluded in certain circumstances

- There are no rules or national environmental standards precluding limited notification.
- The application does not involve a controlled activity that is not a subdivision.

Step 3: If not precluded by Step 2, certain other affected persons must be notified.

- The application does not involve a boundary activity.
- There are no persons where the activity's adverse effects on the person are minor or more than minor (but are not less than minor).

Step 4: Further notification in special circumstances

- There are no special circumstances that warrant the application being limited notified. There is nothing exceptional or unusual about the application that makes limited notification to any other desirable.

SUBSTANTIVE DECISION ASSESSMENT**Effects**

In accordance with section 104(1)(a) of the Resource Management Act 1991, the actual and potential adverse effects associated with the proposed activity have been assessed and outlined above. It is considered that the adverse effects on the environment arising from the proposal are no more than minor.

Offsetting or Compensation Measures

In accordance with section 104(1)(ab) of the Resource Management Act 1991, there are no offsetting or compensation measures proposed or agreed to by the applicant that need consideration.

Objectives and Policies

In accordance with Section 104(1)(b) of the Resource Management Act 1991, the objectives and policies of the 2GP were taken into account when assessing the application. The proposal is considered to be consistent with the following objectives and policies:

- **Objective 5.2.1 and Policies 5.2.1.2, 5.2.1.5 and 5.2.1.6 (Network Utilities Section)**
These seek to ensure that any adverse environmental effects of the construction, operation and upgrading of utilities in the City are avoided, remedied or mitigated by ensuring utilities are designed and located to enable the provision of network utilities while avoiding or adequately mitigating adverse effects on the amenity and character of the zone and the amenity of any surrounding residential activities.
- **Objective 6.2.3 and Policies 6.2.3.3, 6.2.3.4 and 6.2.3.9 (Transportation Section)**
These seek to ensure that land use, development and subdivision activities maintain the safety and efficiency of the transport network for all travel methods.
- **Objective 15.2.3 and Policy 15.2.3.1 (Residential Zones)**
These seek to ensure that activities in residential zones maintain a good level of amenity on surrounding residential properties and public spaces.

As outlined in the effects assessments above, the proposal will provide for the benefits of network utilities in the form of telecommunications, while maintaining the amenity of the zone in which it is located and the surrounding streets. The proposal is a permitted activity under the rules of the 2GP. Accordingly, the proposal is considered to be consistent with the most relevant objectives and policies in the 2GP.

Objectives and Policies Assessment

The proposal is consistent with the relevant objectives and policies of the 2GP detailed above.

Other Matters

Having regard to section 104(1)(c) of the Resource Management Act 1991, no other matters are considered relevant.

Part 2

Based on the findings above, it is evident that the proposal would satisfy Part 2 of the Resource Management Act 1991. Granting of consent would promote the sustainable management of Dunedin's natural and physical resources.

RECOMMENDATION

After having regard to the above planning assessment, I recommend that:

1. This application be processed on a non-notified basis, pursuant to sections 95A and 95B of the Resource Management Act 1991.
2. The Council grant consent to the proposed activity under delegated authority, in accordance with sections 104 and 104B of the Resource Management Act 1991.



Geraldine Bulatete
Graduate Planner

Date: 7 October 2024

DECISION

I have read both the notification assessment and substantive decision assessment in this report. I agree with both recommendations above.

Under delegated authority on behalf of the Dunedin City Council, I accordingly approve the granting of resource consent to the proposal:

*Pursuant to Part 2 and sections 34A(1), 104 and 104A of the Resource Management Act 1991, the Partially Operative Dunedin City Second Generation District Plan 2024, and the Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016, the Dunedin City Council **grants** consent to a **controlled activity** being the upgrade of an existing telecommunications facility with a replacement dish antenna that contravenes the NESTF regulations, within Road Reserve at the intersection of Silverton and Somerville Streets, and Musselburgh Rise, Dunedin, subject to the conditions imposed under section 108 of the Act, as shown on the attached certificate.*



Jeremy Grey
Senior Planner

Date: 7 October 2024

Consent Type: Land Use Consent

Consent Number: LUC-2024-367

Purpose: The upgrade of an existing telecommunications facility with a replacement dish antenna that contravenes the NESTF regulations.

Location of Activity: R Silverton Street, Dunedin (Road Reserve at the intersection of Silverton and Somerville Streets, and Musselburgh Rise).

Legal Description: [REDACTED] reserve.

Lapse Date: 7 October 2029, unless the consent has been given effect to before this date.

Conditions:

- The proposed activity must be undertaken in general accordance with the approved plans attached to this certificate as Appendix One, and the information provided with the resource consent application received by the Council on 23 September 2024.*
- The colour of the proposed microwave dish antenna must match the colour of the existing monopole and/or antenna shroud of the existing telecommunications facility to which it will be attached.*

Advice Notes:

General

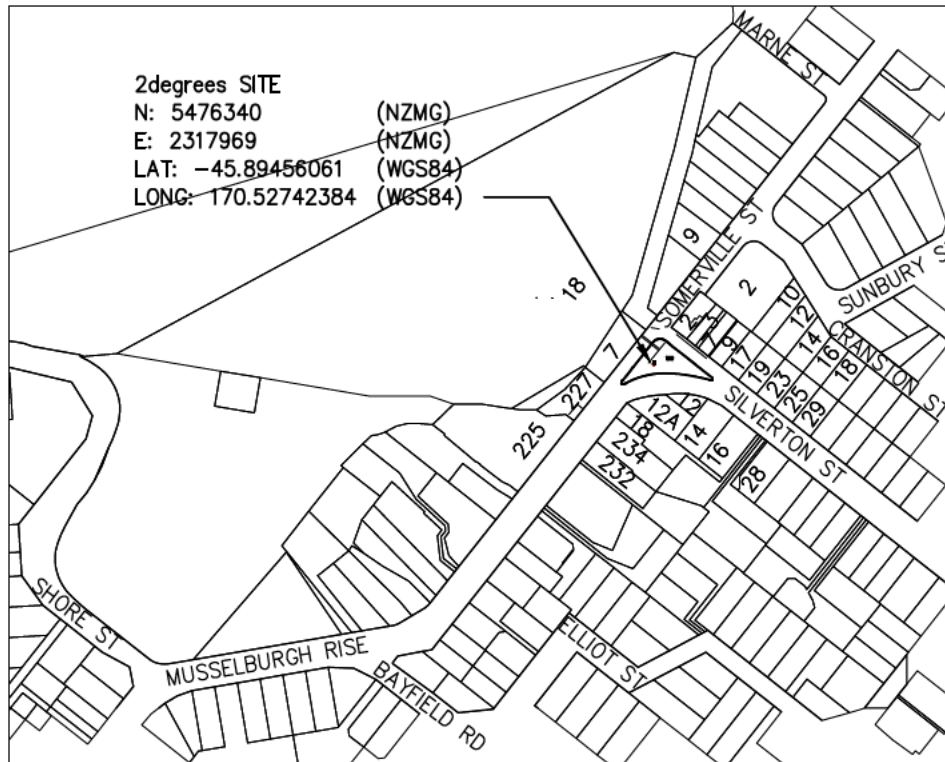
- In addition to the conditions of a resource consent, the Resource Management Act 1991 establishes through sections 16 and 17 a duty for all persons to avoid unreasonable noise, and to avoid, remedy or mitigate any adverse effect created from an activity they undertake.
- Resource consents are not personal property. The ability to exercise this consent is not restricted to the party who applied and/or paid for the consent application.
- It is the responsibility of any party exercising this consent to comply with any conditions imposed on the resource consent prior to and during (as applicable) exercising the resource consent. Failure to comply with the conditions may result in prosecution, the penalties for which are outlined in section 339 of the Resource Management Act 1991.
- The lapse period specified above may be extended on application to the Council pursuant to section 125 of the Resource Management Act 1991.
- This is a resource consent. Please contact the Council's Building Services Department, about the building consent requirements for the work.

Issued at Dunedin on 7 October 2024



Geraldine Bulatete
Graduate Planner

Appendix One: Approved Plans for LUC-2024-367 (scanned images, not to scale)



LOCALITY MAP
SCALE 1:5000

LEGEND - EXISTING SERVICES	
— W —	WATER MAIN
— P — P —	POWER
— G —	GAS
— TC —	TELSTRA
— — —	POWER (OVERHEAD)
— FO —	FIBRE OPTIC
— SW —	STORMWATER
— SS —	SANITARY SEWER
— T —	TELECOM
— HV — — —	HIGH VOLTAGE POWER

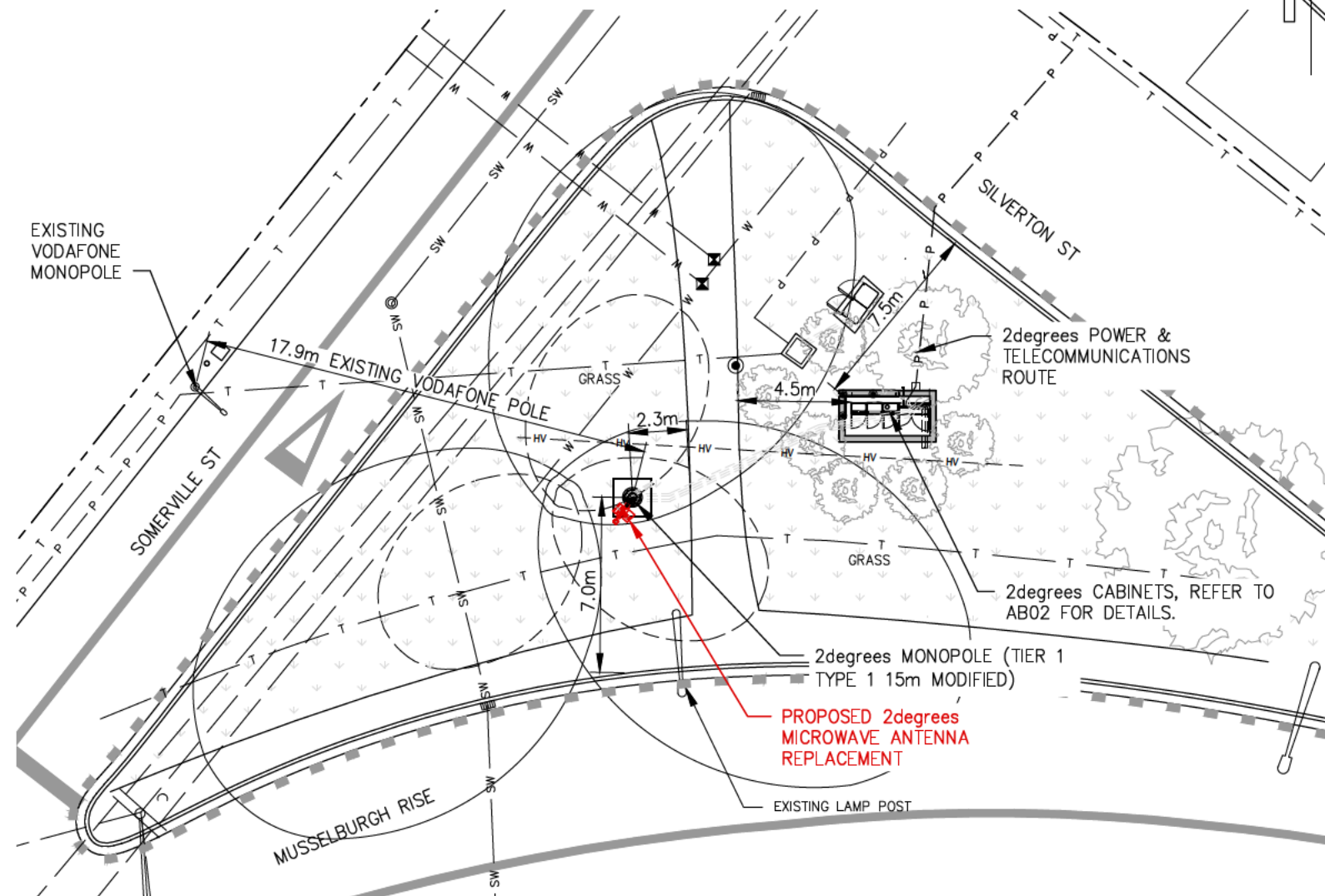
- ⊙ STORMWATER MANHOLE □ DRAINAGE GRATE
● SANITARY SEWER MANHOLE ☒ WATER TOBYBOX

MODIFIED TIER 1
MONOPOLE DEPLOYED

MODIFIED TIER 2
HEADFRAME DEPLOYED

VODAFONE RF ANTENNA INFORMATION		
SECTOR	AZIMUTH (Deg)	ANTENNA TYPE
SECTOR 1	TBC	742 215
SECTOR 2	TBC	742 215
SECTOR 3	TBC	742 215

ANTENNA PLUME LEGEND	
ANTENNA PLUME NZS 2772	
—	25% @ 29.2m DISTANCE
---	100% @ 14.6m DISTANCE



SITE LAYOUT PLAN
SCALE 1:250

EXISTING RF ANTENNA INFORMATION					
SECTOR	AZIMUTH (Deg)	ANTENNA MID HEIGHT (AGL) (m)	ANTENNA TYPE	FEEDER LENGTH (m)	FEEDER TYPE
SECTOR 1	030°	10.8	742 224_v02	25	LDF5-50
SECTOR 2	120°	10.8	742 224_v02	25	LDF5-50
SECTOR 3	230°	10.8	742 224_v02	25	LDF5-50

SITE TYPE "DU" INLINE
ANTENNA DIMENSIONS(mm) KATHERIN 742 224_v02 = 1933h x 261w x 146d
CABINET DIMENSIONS(mm); 1 x UTILITY (1200W x 480D x 900H), 3 x RADIO (600W x 480D x 900H), TOTAL FOOTPRINT (3090 x 480)

PROPOSED MICROWAVE ANTENNA INFORMATION					
DISH TYPE	AZIMUTH (Deg)	ANTENNA MID HEIGHT (AGL) (m)	EXISTING ANTENNA TYPE	PROPOSED ANTENNA TYPE	FAR END SITE
A	312°	9.0	HUAWEI Ø300	ERICSSON Ø413	OTG-071-010 JOHN WICKLIFFE

PS5
MBB Hop (18/80 GHz, 1+0/1+0, 112 MHz, 0.3m, 4 Gbps)
1x ANT3/2 C 0.3 18/80 HPX/HPX - 413 /598
1x MINI LINK 6352 - 108 x 259 x 321
1x MINI LINK 6365 - 179 x 197 x 79
1x MINI LINK 6371 - 204 x 335 x 294

THIS DRAWING WAS PRODUCED FOR TWO DEGREES MOBILE LIMITED AND MAY NOT BE ALTERED WITHOUT THEIR PERMISSION. THE DESIGN REMAINS THE PROPERTY OF TWO DEGREES MOBILE LIMITED WHICH ACCEPTS NO LIABILITY SHOULD THESE DRAWINGS BE ALTERED OR USED WITHOUT AUTHORIZATION TO DO SO.

USE DIMENSIONS SHOWN, ONLY SCALE FROM THIS DRAWING FOR APPROXIMATE USE.

NOTES:

- ACCESS FROM PUBLIC ROAD - SOMERVILLE ST OR MUSSELBURGH RISE.
- ANTENNA HEIGHTS ARE ABOVE GROUND LEVEL (APPROX.).
- FOR FUTURE WORKS IT IS THE CONTRACTOR'S RESPONSIBILITY TO LOCATE AND PROTECT ALL EXISTING SERVICES IN THE VICINITY OF THE SITE (INCLUDING THOSE NOT NECESSARILY SHOWN) PRIOR TO COMMENCEMENT OF ANY WORKS ON SITE. SERVICES SHOWN ARE INDICATIVE ONLY.
- ALL EXISTING SURFACES AND FEATURES HAVE BEEN FULLY REINSTATED TO THEIR ORIGINAL CONDITION TO THE SATISFACTION OF THE ENGINEER ON COMPLETION OF THE WORKS.
- ROUTE CONFIRMED ON SITE BETWEEN CONTRACTOR, OWNER, AND/OR AUTHORITY. REFER TO GREENFIELD E710 SERIES ELECTRICAL STANDARDS DRAWING FOR DETAILS. POWER SUPPLY FROM POWER POLE IN SILVERTON STREET APPROX. 20m AWAY. EARTHING/LIGHTNING OPTION 1.
- REFER TO 2degrees STD-D500 SERIES FOR SIGNS A, B, C, & D. (SELECT AS REQUIRED)
- EXACT CABINET POSITION DETERMINED ON SITE DUE TO EXISTING SERVICES (WITH CONCRETE MOWING STRIP OF 200mm WIDE ON ALL SIDES & MARRIED TO EXISTING SURFACES WHERE PRACTICAL). CABINET COLOUR IS BLACK BEAN GREEN. RESENE CODE: G29-008-161. POLE COLOUR IS JUMBO GREY. RESENE CODE: N64-001-095
- ALL TYPE "DU" CABINETS HAVE 30mm GAP BETWEEN ADJACENT CABINETS.

5	REPLACED HUAWEI MICROWAVE W/ ERICSSON MICROWAVE	JV	13.08.24
4	ADDITIONAL CABINETS	CE	30.10.20
3	CABINET & POLE LOCATION SEE REVISION CLOUDS	SW	20.12.11
2	VF DUCTS REMOVED	RL	23.08.11
1	APPROVED	NP	30.08.11
0	FOR APPROVAL	EH	15.07.11
REF	REVISIONS	BY	DATE

Two Degrees Networks Limited

PROJECT ADDRESS:

ANDERSONS BAY, JUNCTION
OF MUSSELBURGH RISE, SOMERVILLE ST
AND SILVERTON ST, DUNEDIN

PROJECT TITLE:

LOCALITY & SITE LAYOUT PLAN

DESIGNED: CH	DATE: 30.08.11	SITE ACO APPROVAL: PR	CAD FILE:
DRAWN: JV	DATE: 13.08.24	RMA APPROVAL: SF	CAD DIR:
REVIEWED: BT	DATE: 31.08.11	RF APPROVAL: EB	SITE ACO BY:
STRUCTURAL AB	DATE: 26.10.11	TRANS. APPROVAL: PU	SURVEY BY: PPP LTD
APPROVED: CM	DATE: 26.10.11	CONST. APPROVAL: PB	SURVEY DATE: 17.05.2011
		ASBUILT BY:	

2degrees DRAWING TITLE:

GREENFIELD (URBAN) - PLANNING

JOB No: OTG-071-024	CANDIDATE ID: F	SCALE: AS SHOWN A3 ORIGINAL	A3
DRAWING No:			REV

OTG-071-024-P01

5

EXISTING 2degrees
3x ANTENNA

PROPOSED 2degrees
MICROWAVE ANTENNA
REPLACEMENT
ERICSSON Ø413mm DISH
ATTACHED TO EXISTING
MW BRACKET

MINI LINK 6365

MINI LINK 6371

MINI LINK 6352

PROPOSED MICROWAVE PLAN
SCALE 1:20

EXISTING 2degrees
HEADFRAME &
ANTENNAS.

RL 30.8m

EXISTING VODAFONE
MONOPOLE

PROPOSED 2degrees
MICROWAVE ANTENNA
REPLACEMENT
ERICSSON Ø413mm DISH
ATTACHED TO EXISTING
MW BRACKET

2degrees URBAN MONOPOLE
(TIER 1 TYPE 1 15m
MODIFIED) REFER STD-601
(REV 3) FOR DETAILS

RL 15.5m

SOMERVILLE ST

RL 16.3m

MUSSELBURGH RISE

APPROXIMATE
TOPOGRAPHY AT
EXISTING VODAFONE
POLE LOCATION.

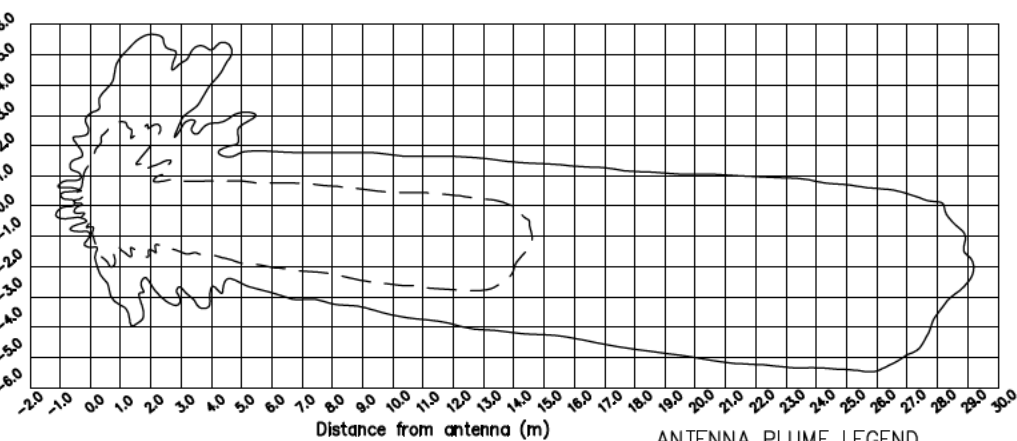
NOTE: CABINETS NOT
SHOWN AS TOP OF
CABINETS BELOW
TOPOGRAPHY AT THIS
ELEVATIONAL VIEW

2degrees CONCRETE PILE
FOUNDATION. REFER STD-D601-5
FOR FURTHER DETAILS

APPROXIMATE
TOPOGRAPHY AT
POLE LOCATION.

PROPOSED SOUTHWESTERN ELEVATION
SCALE 1:200

Reference point: Center of panel
antenna (m)



PANEL ANTENNA PLUME ELEVATION
SCALE 1:250

ANTENNA PLUME LEGEND

ANTENNA PLUME NZS 2772

— 25% @ 29.2m DISTANCE

- - - 100% @ 14.6m DISTANCE

EXISTING 2degrees
LIGHTNING ROD

EXISTING 2degrees
ANTENNAS SHROUDED
- T2 URBAN

EXISTING 2degrees
MICROWAVE ANTENNA
HUAWEI Ø300mm
TO BE REPLACED WITH
ERICSSON Ø413mm

EXISTING 2degrees
URBAN MONOPOLE

EXISTING 2degrees
CABINETS &
RETAINING STRUCTURE

EXISTING SOUTHERN PHOTO
NOT TO SCALE

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USE DIMENSIONS SHOWN, ONLY SCALE FROM THIS DRAWING FOR APPROXIMATE USE.

NOTES:

1. REFER TO SHEET P01.
2. SITE ACCESSIBLE BY CHERRY PICKER.
3. CABINET COLOUR BLACK BEAN GREEN. RESENE CODE: G29-008-161.
4. POLE COLOUR JUMBO GREY. COLOUR CODE: N64-001-095.
5. POLE DESIGNED TO ACCOMMODATE DOUBLE STACKED HEADFRAME IN FUTURE IF REQUIRED.
6. PATH RESEALED IN CENTRE OF ISLAND.

5	REPLACED HUAWEI MICROWAVE W/ ERICSSON MICROWAVE	JV	13.08.24
4	ADDITIONAL CABINETS	CE	30.10.20
3	CABINET & POLE LOCATION SEE REVISION CLOUDS	SW	20.12.11
2	VF DUCTS REMOVED	RL	23.06.11
1	APPROVED	NP	30.08.11
0	FOR APPROVAL	EH	19.07.11
REF	REVISIONS	BY	DATE

Two Degrees Networks Limited

PROJECT ADDRESS:

ANDERSONS BAY, ADJACENT TO JUNCTION
OF MUSSELBURGH RISE, SOMERVILLE ST
AND SILVERTON ST, DUNEDIN

PROJECT TITLE:

ELEVATIONS

DESIGNED: CH	DATE: 30.08.11	SITE ACO APPROVAL: PR	CAD FILE:
DRAWN: JV	DATE: 13.08.24	RMA APPROVAL: SF	CAD DIR:
REVIEWED: BT	DATE: 31.08.11	RF APPROVAL: EB	SITE ACO BY:
STRUCTURAL AB	DATE: 26.10.11	TRANS. APPROVAL: PU	SURVEY BY: PPP LTD
APPROVED: CM	DATE: 26.10.11	CONST. APPROVAL: PB	SURVEY DATE: 17.05.2011
			ASBUILT BY:

2degrees DRAWING TITLE:

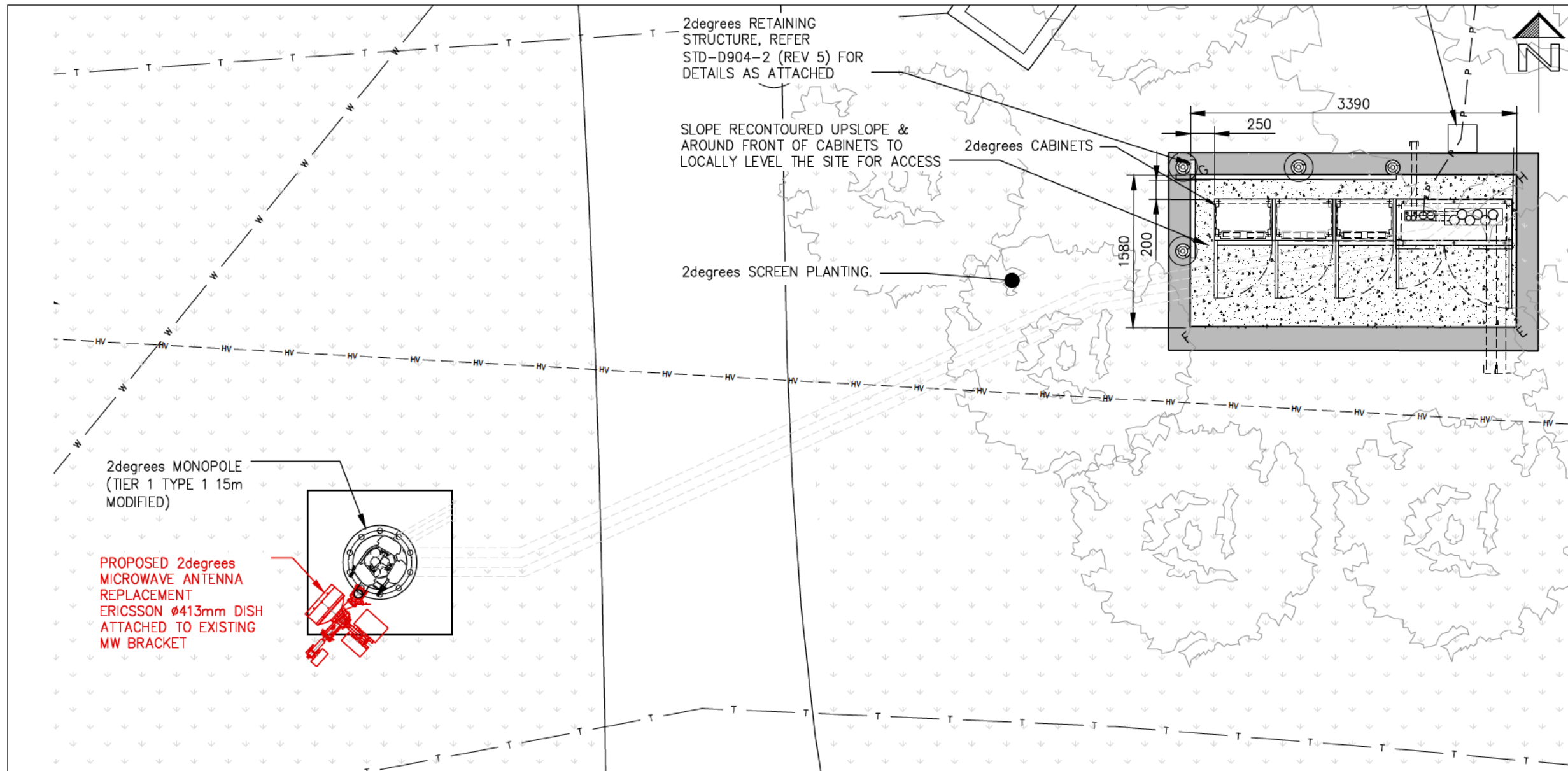
GREENFIELD (URBAN) - PLANNING

JOB No: OTG-071-024	CANDIDATE ID: F	SCALE: AS SHOWN A3 ORIGINAL	A3
------------------------	--------------------	-----------------------------------	----

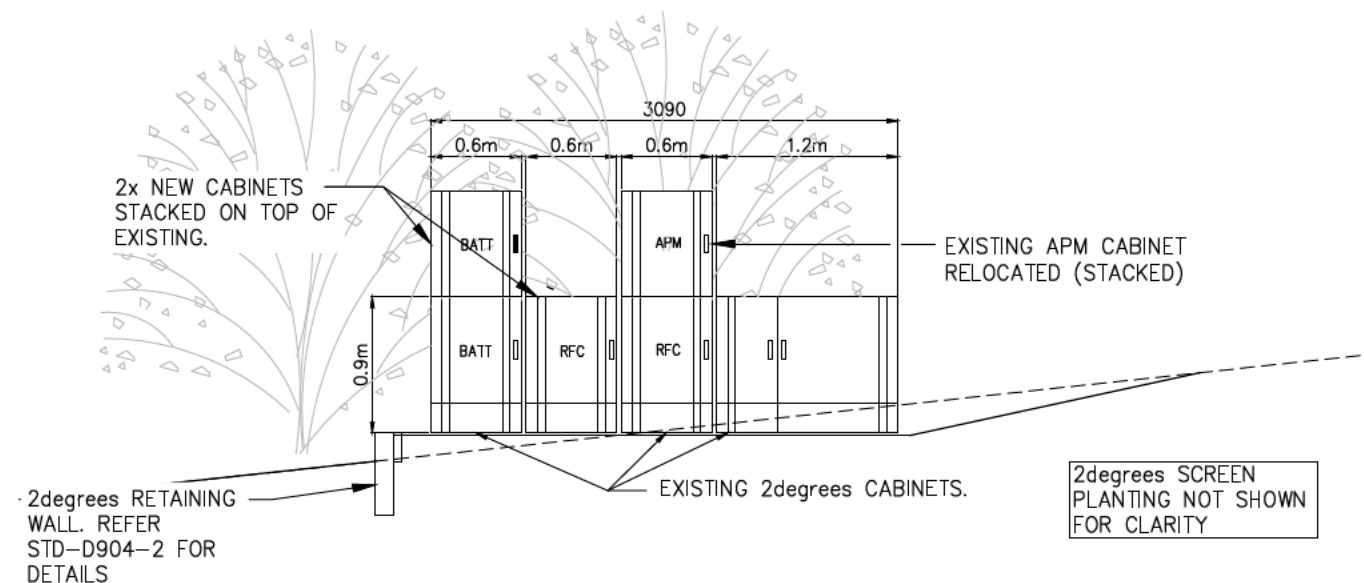
DRAWING No:

OTG-071-024-P02

REV
5



DETAIL LAYOUT PLAN
SCALE 1:50



SOUTHWEST ELEVATION
EQUIPMENT CABINET
SCALE 1:50

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NOTES:

1. REFER TO SHEET P01.
2. SITE ACCESSIBLE BY CHERRY PICKER.
3. CABINET COLOUR BLACK BEAN GREEN. RESENE CODE: G29-008-161.
4. POLE COLOUR JUMBO GREY. COLOUR CODE: N64-001-095.
5. POLE DESIGNED TO ACCOMMODATE DOUBLE STACKED HEADFRAME IN FUTURE IF REQUIRED.
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5	REPLACED HUAWEI MICROWAVE W/ ERICSSON MICROWAVE	JV	13.08.24
4	ADDITIONAL CABINETS	CE	30.10.20
3	CABINET & POLE LOCATION SEE REVISION CLOUDS	SW	20.12.11
2	VF DUCTS REMOVED	RL	23.06.11
1	APPROVED	NP	30.08.11
0	FOR APPROVAL	EH	19.07.11
REF	REVISIONS	BY	DATE

Two Degrees
Networks Limited

PROJECT ADDRESS:

ANDERSONS BAY, ADJACENT TO JUNCTION
OF MUSSELBURGH RISE, SOMERVILLE ST
AND SILVERTON ST, DUNEDIN

PROJECT TITLE:

DETAIL LAYOUT PLAN

DESIGNED:	DATE:	SITE ACO APPROVAL:	CAD FILE:
CH	30.08.11	PR	
DRAWN:	DATE:	RMA APPROVAL:	CAD DIR:
JV	13.08.24	SF	
REVIEWED:	DATE:	RF APPROVAL:	SITE ACO BY:
BT	31.08.11	EB	
STRUCTURAL	DATE:	TRANS. APPROVAL:	SURVEY BY:
AB	26.10.11	PU	PPP LTD
APPROVED:	DATE:	CONST. APPROVAL:	SURVEY DATE:
CM	26.10.11	PB	17.05.2011
			ASBUILT BY:

2degrees DRAWING TITLE:

GREENFIELD (URBAN) - PLANNING

JOB No:	CANDIDATE ID:	SCALES:	AS SHOWN	A3
OTG-071-024	F	A3 ORIGINAL		
DRAWING No:				REV

OTG-071-024-P03

5



Appendix H Telecommunication Act Notice

Resource Consent Application

**Roadside Telecommunication Facility Upgrade, opposite 12A Silverton Street,
Andersons Bay**

Two Degrees Networks Limited

SLR Project No.: 810.V16399.00001

12 August 2025

Peter Hughes
Senior Contract Supervisor, Transportation
Dunedin City Council
50 Octagon, Dunedin 9058

FAO: Peter Hughes by email Pre.CAR@dcc.govt.nz

29 April 2025

Dear Peter

Re: Connexa Site Ref: Andersons Bay – OTG 071 024
Telecommunications Act 2001: Notice of intention to install telecommunications equipment on road reserve.

This is a notice pursuant to sections 136 and 142 of the Telecommunications Act 2001 (Act).

Connexa gives notice that it intends to construct, place and/or maintain wireless works, lines and/or cabinets in and on a road, and to carry out work for those purposes (Work).

Location of the Work:

In the berm off Musselburgh Rise, Dunedin.

Site location and equipment layout is shown in the attached planning drawing OTG 071 024 – PO1&PO2/REV6

Nature of the Work:

Work involves the following:

- A replacement cellular pole will be installed (“New Pole”) adjacent the existing pole, which will be removed and the ground made good.
- All existing cabinets will be removed except for the end utility cabinet. Two new green cabinets with a small foundation extension will be installed to the East of the Pole and adjacent the utility cabinet.
- The structure will be 18metres high and house the new pole and new headframe. The Pole will support up to 6 antennas and ancillary equipment (old pole with equipment was 12metres tall).
- Dish to be removed.
- Power and telecommunications fibre will remain connected to the Telecommunication Facility once the replacement pole and cabinets are installed.
- The work will require opening of the road in order to extend the foundations and other supporting infrastructure.

Reason for the work:

The work is to construct, place and/or maintain a cell site to provide wireless and mobile telecommunications services to mobile network customers and roaming customers in the vicinity of the site.

Please advise within 15 working days of receipt of this notice if you require any reasonable conditions in relation to the work.

We acknowledge that a corridor access request and approved traffic management plan are required prior to construction. The appropriate RMA approval will be requested following the Telecommunications Notice approval.

If you wish to discuss this notice, please contact me at the address above or on the number below.

Yours sincerely



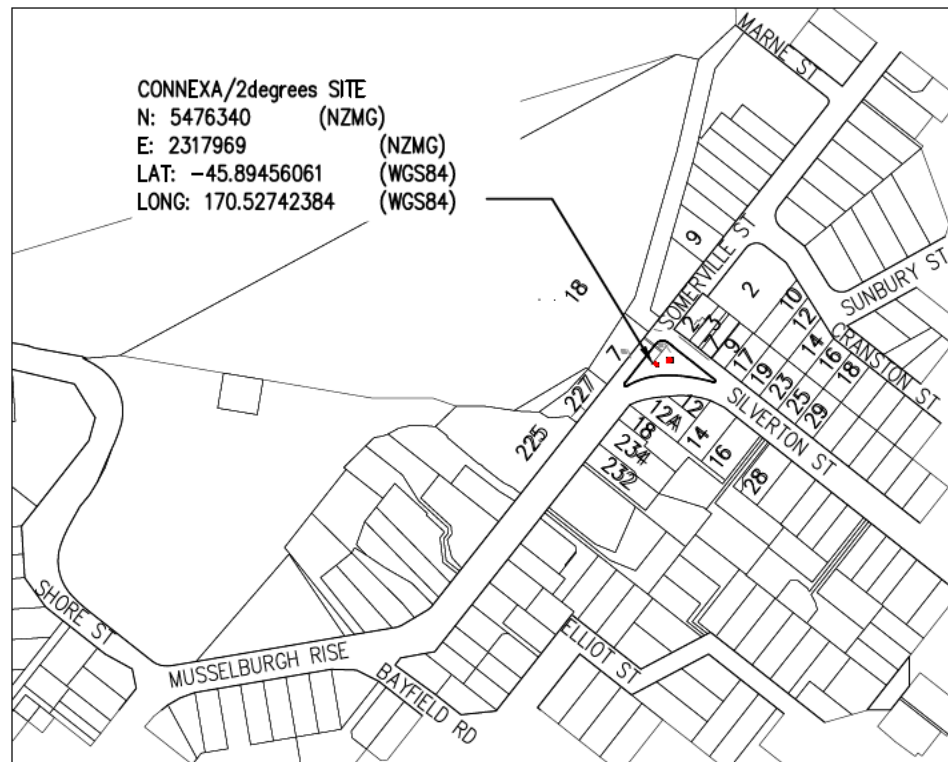
Peter Rogan

Site Acquisition

Wilson Hurst on behalf of Connexa Limited

Appendix A.

Attached plans - OTG 071 024 – PO1&PO2/REV6.



LOCALITY MAP
SCALE 1:5000

LEGEND – EXISTING SERVICES	
— W —	WATER MAIN
— P — P —	POWER
— G —	GAS
— TC —	TELSTRA
— —	POWER (OVERHEAD)
— FO —	FIBRE OPTIC
— SW —	STORMWATER
— SS —	SANITARY SEWER
— T —	TELECOM
— HV — HV —	HIGH VOLTAGE POWER

- STORMWATER MANHOLE □ DRAINAGE GRATE
● SANITARY SEWER MANHOLE ✕ WATER TOBYBOX

MODIFIED TIER 1
MONOPOLE DEPLOYED

MODIFIED TIER 2
HEADFRAME DEPLOYED

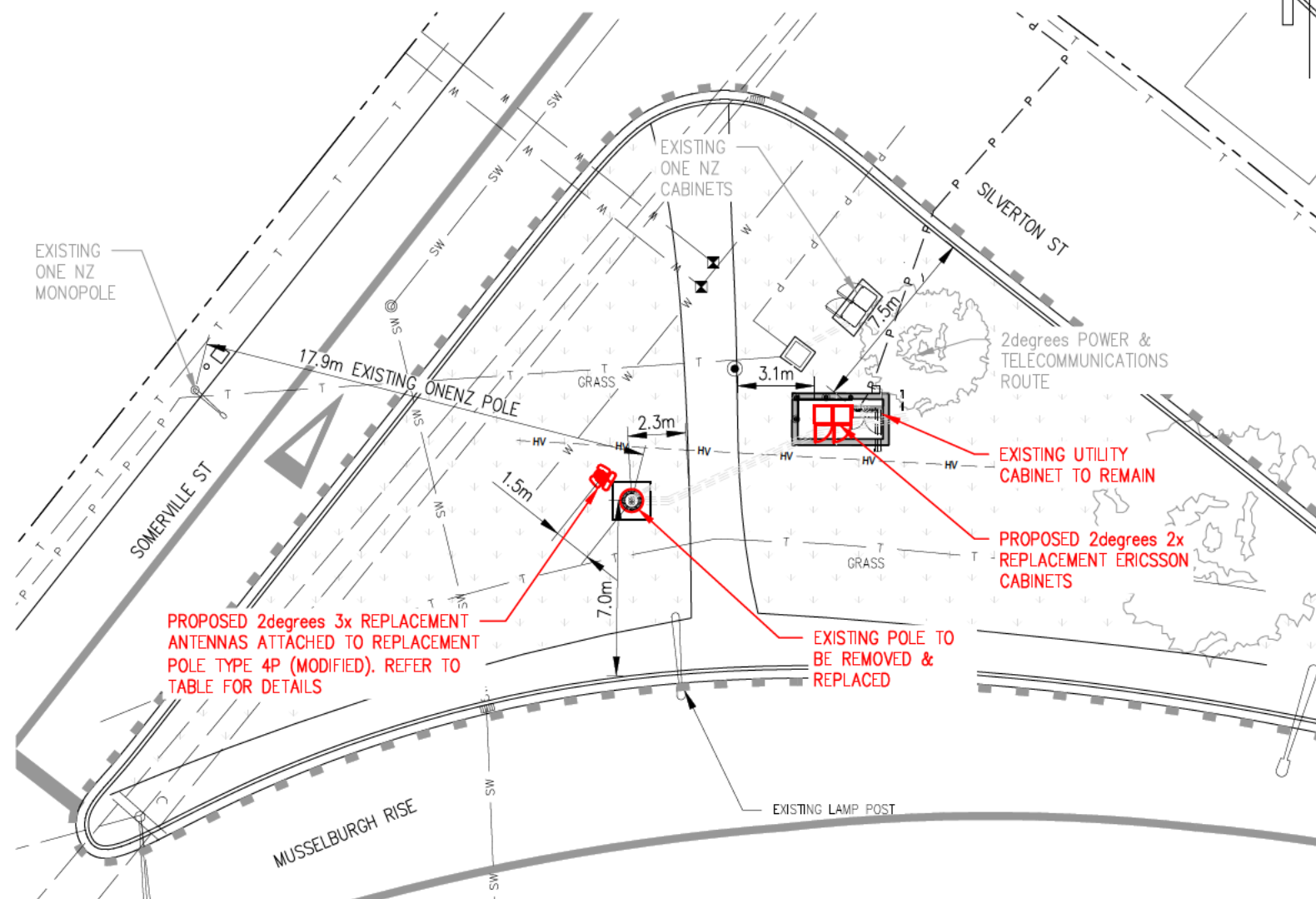
ONE NZ RF ANTENNA INFORMATION		
SECTOR	AZIMUTH (Deg)	ANTENNA TYPE
SECTOR 1	TBC	742 215
SECTOR 2	TBC	742 215
SECTOR 3	TBC	742 215



RF ANTENNA INFORMATION								
SECTOR	AZIMUTH (Deg)	ANTENNA MID HEIGHT (m)	MECH. DOWN TILT	PROPOSED ANTENNA	ANTENNA SIZE H x W x D (m)	RRH	EXISTING ANTENNA	EXISTING ANTENNA SIZE H x W x D (m)
1A	30°	15.9	—	ASI4518R84v06	2.099 x 0.499 x 0.206	2	742 224 v02	1.933 x 0.261 x 0.146
1B	30°	17.6	—	AIR3268	0.568 x 0.370 x 0.146	—	—	—
2A	120°	15.9	-2	AQU4520R01v06	2.550 x 0.749 x 0.226	2	742 224 v02	1.933 x 0.261 x 0.146
2B	120°	17.6	-2	AIR3268	0.568 x 0.370 x 0.146	—	—	—
3A	230°	15.9	—	ASI4518R84v06	2.099 x 0.499 x 0.206	2	742 224 v02	1.933 x 0.261 x 0.146
3B	230°	17.6	—	AIR3268	0.568 x 0.370 x 0.146	—	—	—

ANCILLARY EQUIPMENT DIMENSIONS (H x W x D)
RRH 4499 B1 B3 = 553 x 398 x 151, 32kg
RRH 4499 B01 B28 = 553 x 398 x 190, 37.6kg

MICROWAVE ANTENNA INFORMATION				
DISH TYPE	AZIMUTH (Deg)	ANTENNA MID HEIGHT (AGL) (m)	EXISTING ANTENNA TYPE	FAR END SITE
A	312°	9.0	HUAWEI Ø300	TO BE REMOVED



SITE LAYOUT PLAN
SCALE 1:250

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NOTES:

- ACCESS FROM PUBLIC ROAD – SOMERVILLE ST OR MUSSELBURGH RISE.
- ANTENNA HEIGHTS ARE ABOVE GROUND LEVEL (APPROX.).
- IT IS THE CONTRACTOR'S RESPONSIBILITY TO LOCATE AND PROTECT ALL EXISTING SERVICES IN THE VICINITY OF THE SITE (INCLUDING THOSE NOT NECESSARILY SHOWN) PRIOR TO COMMENCEMENT OF ANY WORKS ON SITE. SERVICES SHOWN ARE INDICATIVE ONLY.
- ALL EXISTING SURFACES AND FEATURES HAVE BEEN FULLY REINSTATED TO THEIR ORIGINAL CONDITION TO THE SATISFACTION OF THE ENGINEER ON COMPLETION OF THE WORKS.
- POWER SUPPLY FROM POWER POLE IN SILVERTON STREET APPROX. 20m AWAY. EARTHING/LIGHTNING OPTION 1.
- REFER TO 2degrees STD-D500 SERIES FOR SIGNS A, B, C, & D. (SELECT AS REQUIRED)
- THE ACTIVE ASSETS OF THE SITE ARE OWNED BY 2degrees AND THE PASSIVE ASSETS OF THE SITE ARE OWNED BY CONNEXA, FURTHER CLARIFICATION OF THIS IS AVAILABLE ON REQUEST.

6	NEW REPLACEMENT ANTENNAS & CABINETS	SG	25.04.25
5	REPLACED HUAWEI MICROWAVE W/ ERICSSON MICROWAVE	JV	13.08.24
4	ADDITIONAL CABINETS	CE	20.10.20
3	CABINET & POLE LOCATION SEE REVISION CLOUDS	SW	20.12.11
2	VF DUCTS REMOVED	RL	23.08.11
1	APPROVED	NP	30.08.11
0	FOR APPROVAL	EH	15.07.11
REF	REVISIONS	BY	DATE

Two Degrees Networks Limited

PROJECT ADDRESS:

ANDERSONS BAY, JUNCTION
OF MUSSELBURGH RISE, SOMERVILLE ST
AND SILVERTON ST, DUNEDIN

PROJECT TITLE:

LOCALITY & SITE LAYOUT PLAN

DESIGNED: CH	DATE: 30.08.11	SITE ACO APPROVAL: PR	CAD FILE:
DRAWN: RV	DATE: 22.01.25	RMA APPROVAL: SF	CAD DIR:
REVIEWED: BT	DATE: 31.08.11	RF APPROVAL: EB	SITE ACO BY:
STRUCTURAL AB	DATE: 26.10.11	TRANS. APPROVAL: PU	SURVEY BY: PPP LTD
APPROVED: CM	DATE: 26.10.11	CONST. APPROVAL: PB	SURVEY DATE: 17.05.2011
			ASBUILT BY:

2degrees DRAWING TITLE:

GREENFIELD (URBAN) - PLANNING

JOB No: OTG-071-024	CANDIDATE ID: F	SCALES: AS SHOWN A3 ORIGINAL	A3 REV
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DRAWING No:
OTG-071-024-P01

6

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USE DIMENSIONS SHOWN, ONLY SCALE FROM THIS DRAWING FOR APPROXIMATE USE.

NOTES:

1. REFER TO SHEET P01.

2. SITE ACCESSIBLE BY CHERRY PICKER.

3. PROPOSED REPLACEMENT CABINETS TO BE PAINTED BLACK BEAN GREEN COLOUR TO MATCH EXISTING. COLOUR CODE N64-001-161.

6	NEW REPLACEMENT ANTENNAS & CABINETS	SG	25.04.25
5	REPLACED HUAWEI MICROWAVE W/ ERICSSON MICROWAVE	JV	13.08.24
4	ADDITIONAL CABINETS	CE	30.10.20
3	CABINET & POLE LOCATION SEE REVISION CLOUDS	SW	20.12.11
2	VF DUCTS REMOVED	RL	23.08.11
1	APPROVED	NP	30.08.11
0	FOR APPROVAL	EH	19.07.11
REF	REVISIONS	BY	DATE

Two Degrees Networks Limited

PROJECT ADDRESS:

ANDERSONS BAY, ADJACENT TO JUNCTION OF MUSSELBURGH RISE, SOMERVILLE ST AND SILVERTON ST, DUNEDIN

PROJECT TITLE:

ELEVATIONS

DESIGNED:	DATE	SITE ACQ APPROVAL:	CAD FILE:
CH	30.08.11	PR	
DRAWN:	DATE	RMA APPROVAL:	CAD DIR:
RV	22.01.25	SF	
REVIEWED:	DATE	RF APPROVAL:	SITE ACQ BY:
BT	31.08.11	EB	
STRUCTURAL:	DATE	TRANS. APPROVAL:	SURVEY BY:
AB	26.10.11	PU	PPP LTD
APPROVED:	DATE	CONST. APPROVAL:	SURVEY DATE:
CM	26.10.11	PB	17.05.2011
			ASBUILT BY:

2degrees DRAWING TITLE:

GREENFIELD (URBAN) - PLANNING

JOB No:	CANDIDATE ID:	SCALES:	AS SHOWN
OTG-071-024	F	A3	ORIGINAL
DRAWING No:			REV
OTG-071-024-P02			6



Appendix I Community Letter

Resource Consent Application

**Roadside Telecommunication Facility Upgrade, opposite 12A Silverton Street,
Andersons Bay**

Two Degrees Networks Limited

SLR Project No.: 810.V16399.00001

12 August 2025



30 June 2025

WE'RE IMPROVING MOBILE COVERAGE IN ANDERSONS BAY

Owner/Occupier

PLEASE READ – NEIGHBOURHOOD INFORMATION

225 Musselburgh Rise
Andersons Bay
Dunedin 9013

Dear Owner/Occupier,

If you are not the owner of this property, please ensure the owner receives a copy of this letter.

2degrees is a full-service telecommunications company with a nationwide mobile network and 1.4million customers. We are constantly improving and upgrading this network to increase coverage and performance.

So, in line with this we wanted to let you know that we are submitting an application to Council to upgrade the existing telecommunications facility at the intersection of Somerville Street / Musselburgh Rise / Silverton Street, Andersons Bay, which will expand our coverage and capacity in your area (please refer to the back of this letter for the location).

The upgrade will involve installing a replacement pole right next to our existing facility, installing antennas at the top of the pole, and replacing two existing cabinets in the road reserve. The existing pole and antennas will be removed. The upgrade requires resource consent under the Resource Management Act 1991 and we will apply to Council for this consent.

What happens next?

Once we receive the necessary approvals from the Council, and before we start the upgrade of the 2degrees facility we will send you another letter to advise when the build will occur.

Please be assured that our contractors will try and keep noise and any disruption to the surrounding area to a minimum.

What about our health and safety?

Our equipment fully complies with the stringent standards set by the New Zealand Ministry of Health. Fundamentally the technology used is the same radio technology as WiFi, cordless phones, and baby monitors.

For further information:

Visit - <https://www.2degrees.nz/termsfuse/mobile-phone-sites/>

Call - 0800 718 000 or

Email - community@2degrees.nz

Thanks for your patience while we get this network upgrade underway in your area.

Regards,
2degrees Community Team



Figure 1: Location of existing facility to be upgraded (Source: Grip Maps)



Figure 2: Indicative photomontage of the upgraded facility looking north-west toward the facility from Silverton Street. (Source: 2degrees)



Figure 3: Indicative photomontage of the upgraded facility looking north-east toward the facility from Musselburgh Rise. (Source: 2degrees)





Appendix J Correspondence with DCC

Resource Consent Application

**Roadside Telecommunication Facility Upgrade, opposite 12A Silverton Street,
Andersons Bay**

Two Degrees Networks Limited

SLR Project No.: 810.V16399.00001

12 August 2025

Jo Li

From: [REDACTED]
To: George McMahon
Subject: RE: Proposed telecommunication facility within road reserve at corner of Silverton Street and Musselburgh Rise

From: Jane O'Dea <Jane.O'Dea@dcc.govt.nz>
Sent: Thursday, 13 February 2025 3:59 pm
To: George McMahon [REDACTED]
Subject: FW: Proposed telecommunication facility within road reserve at corner of Silverton Street and Musselburgh Rise

Hi George

Could you please provide the COC reference as I haven't been able to locate it due to lack of site address being road reserve.

See initial responses below -

- Would a height of 18-20m be a height that the Council would consider as appropriate? **Not possible to provide a view at this stage - any judgement on this would need to be informed by a proper assessment.**
- Are there any parties that the Council would flag early in the process as affected parties? **Residential properties with a view directly impacted by the mast, DCC Transport would likely be asked to comment on any application.**
- Is there any information requirements you would consider necessary to support the application? **Thorough assessment of alternatives, including alternative locations, a visual and urban amenity effects assessment, preferably undertaken in accordance with Te Tangi a Te Manu (Aotearoa New Zealand Landscape Assessment Guidelines) by a qualified landscape architect. It is recommended that the assessment includes photo simulations of the mast from a range of surrounding representative view locations (e.g nearby residential locations, from the perspective of users of the nearby park, road users etc.) Any visual simulation would need to be prepared in accordance with the Guidelines are set out in 'NZILA Best Practice Guide 10.2, Visual Simulations' (2010). The assessment guidance at 2GP section 5.8.2.1 should be consulted and addressed in the application.**

Ngā mihi | Kind regards

Jane O'Dea

ASSOCIATE SENIOR PLANNER / KAIMAHERE

RESOURCE CONSENTS / TOHU WHAKAMAHI RAWA

P 03 477 4000 | DD 03 474 2130 | E jane.o'dea@dcc.govt.nz

Dunedin City Council/ Kaunihera a-rohe o Ōtepoti, 50 The Octagon, Dunedin

PO Box 5045, Dunedin 9054

New Zealand

www.dunedin.govt.nz

From: George McMahon [REDACTED]
Sent: Wednesday, 5 February 2025 5:06 p.m.
To: Jane O'Dea <Jane.O'Dea@dcc.govt.nz>
Subject: RE: Proposed telecommunication facility within road reserve at corner of Silverton Street and Musselburgh Rise

Thanks Jane, sounds good.

Thanks,
George

George McMahon

Associate Consultant - Planning

O +64 9 303 0311
M +64 210 711 480
E george.mcmahon@slrconsulting.com

SLR Consulting New Zealand Limited
201 Victoria Street West, Auckland, New Zealand 1010



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From: Jane O'Dea <Jane.O'Dea@dcc.govt.nz>
Sent: Wednesday, 5 February 2025 4:55 pm
To: George McMahon [REDACTED]
Subject: RE: Proposed telecommunication facility within road reserve at corner of Silverton Street and Musselburgh Rise

You don't often get email from jane.o'dea@dcc.govt.nz. [Learn why this is important](#)

Hi George
I'll get back to you next week.

Ngā mihi | Kind regards

Jane O'Dea

ASSOCIATE SENIOR PLANNER / KAIMAHERE

RESOURCE CONSENTS / TOHU WHAKAMAHI RAWA

P 03 477 4000 | DD 03 474 2130 | E jane.o'dea@dcc.govt.nz

Dunedin City Council/ Kaunihera a-rohe o Ōtepoti, 50 The Octagon, Dunedin
PO Box 5045, Dunedin 9054



If this message is not intended for you please delete it and notify us immediately; you are warned that any further use, dissemination, distribution or reproduction of this material by you is prohibited..

From: George McMahon <g[REDACTED]>
Sent: Tuesday, 4 February 2025 10:12 a.m.
To: Jane O'Dea <Jane.O'Dea@dcc.govt.nz>
Subject: Re: Proposed telecommunication facility within road reserve at corner of Silverton Street and Musselburgh Rise

Hi Jane,

Two Degrees is proposing to upgrade the pole to facilitate 5G as well as improve coverage to the surrounding area. The existing pole is 9.3m in height excluding antennas which are approximately 3m in height. For a total height of 12.3m. The pole was established by way of COC in 2011.

Due to nearby dwellings and the topography. There is an operational need to increase the height to a minimum of 18m, and potentially a maximum height of 20m, to comply with all radio-frequency requirements.

My questions are, provided the resource consent application adequately addresses all matters required for a large-scale utility (as does not meet the small-scale thresholds)

- Would a height of 18-20m be a height that the Council would consider as appropriate?
- Are there any parties that the Council would flag early in the process as affected parties?
- Is there any information requirements you would consider necessary to support the application?

Thanks,
George

Get [Outlook for Android](#)

George McMahon

Associate Consultant - Planning

O +64 9 303 0311

M +64 210 711 480

E george.mcmahon@slrconsulting.com

SLR Consulting New Zealand Limited
201 Victoria Street West, Auckland, New Zealand 1010



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If you have received this e-mail in error, please notify the author and delete this message immediately.

From: Jane O'Dea <Jane.O'Dea@dcc.govt.nz>

Sent: Monday, February 3, 2025 5:09:18 PM

To: George McMahon [REDACTED]

Subject: FW: Proposed telecommunication facility within road reserve at corner of Silverton Street and Musselburgh Rise

You don't often get email from jane.o'dea@dcc.govt.nz. [Learn why this is important](#)

Hi George

If you could send through some further details that would be appreciated.

Ngā mihi | Kind regards

Jane O'Dea

ASSOCIATE SENIOR PLANNER / KAIMAHERE

RESOURCE CONSENTS / TOHU WHAKAMAHI RAWA

P 03 477 4000 | DD 03 474 2130 | E jane.o'dea@dcc.govt.nz

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From: George McMahon [REDACTED]

Sent: Monday, 3 February 2025 4:08 p.m.

To: Planning <cod.planning@dcc.govt.nz>

Subject: Proposed telecommunication facility within road reserve at corner of Silverton Street and Musselburgh Rise

Good afternoon,

Can we please request a duty planner to discuss potential options for a proposed telecommunication facility at the corner of Silverston Street and Musselburgh Rise. The site is zoned General Residential 2. In particular we wish to discuss how the Council considers infringements to maximum height in this zoning.

Existing Two Degrees telco facility, pictured below (foreground)



Happy to discuss over the phone or provide a detail email for review. Which ever option is easier for the duty planner.

Ngā mihi nui,

George McMahon
Associate Consultant - Planning

O [REDACTED]
[REDACTED]
[REDACTED]

SLR Consulting New Zealand Limited
201 Victoria Street West, Auckland, New Zealand 1010



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Appendix K Application Form

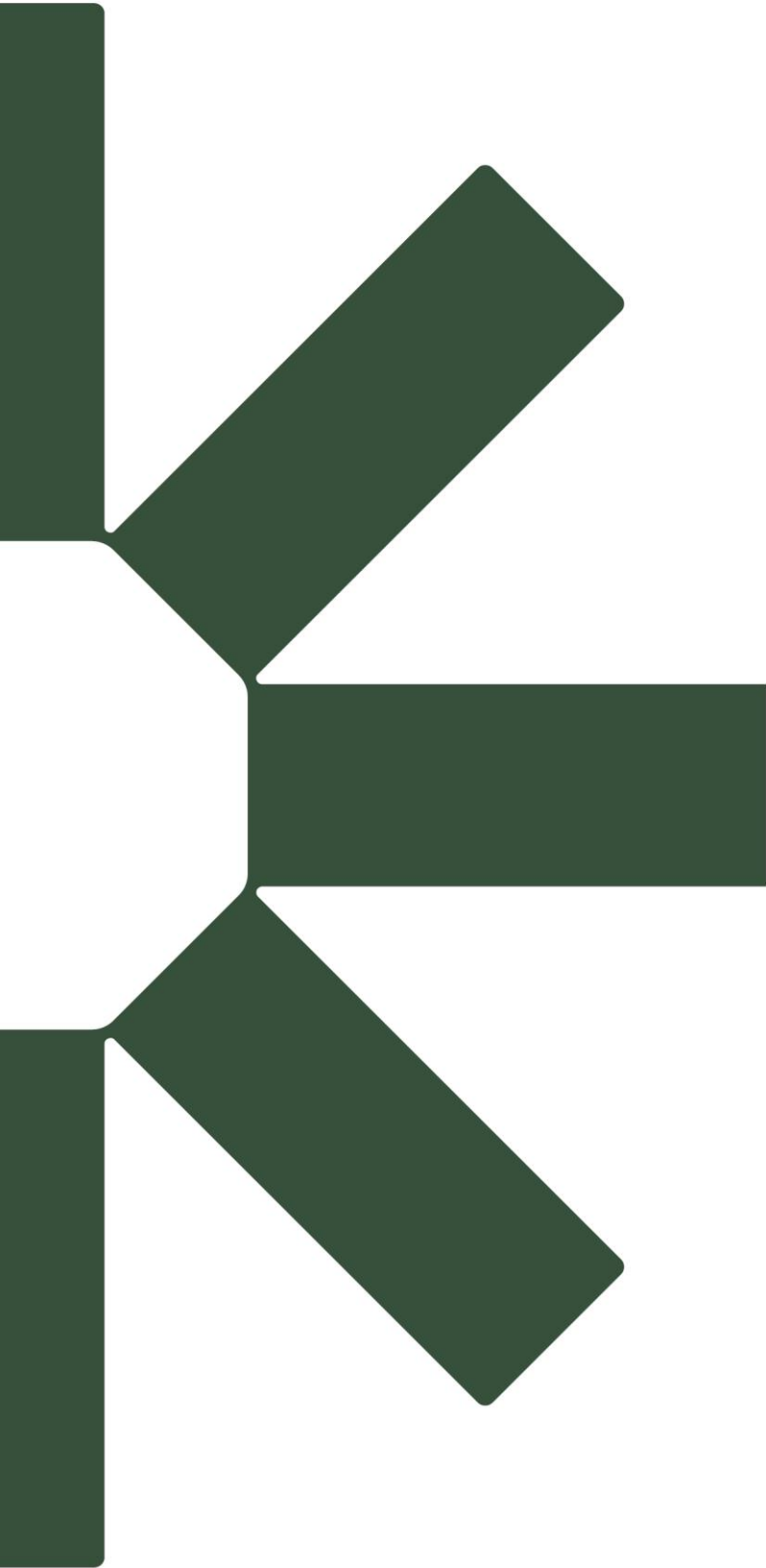
Resource Consent Application

**Roadside Telecommunication Facility Upgrade, opposite 12A Silverton Street,
Andersons Bay**

Two Degrees Networks Limited

SLR Project No.: 810.V16399.00001

12 August 2025



Making Sustainability Happen