

Proposed National Environmental Standard for Telecommunications Facilities

Report on Submissions

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Contents

1	Introduction	1
1.1	Background	1
1.2	Proposed standard	1
1.3	National environmental standard development process	2
1.4	Purpose	3
2	Overview of Submissions	4
2.1	Summary of submitters' positions	4
2.2	Key themes analysis	5
3	General Submission Summary	8
3.1	Health effects	8
3.2	Other (non-health) effects	9
3.3	Facilities 'as of right'	9
3.4	Lack of ability to exercise local control	10
3.5	Support for the general intent of the proposal	10
3.6	Scope of the NES	11
3.7	Effects of the NES	12
3.8	Telecommunications sector change and unbundling	12
3.9	Roles and responsibilities	12
3.10	Alternatives	13
3.11	Specific questions	13
3.12	Process	14
3.13	Overview of submitter comments by submitter type	15
4	Submissions on Sections 3.3 to 3.6	16
4.1	Section 3.3: Radio-frequency field exposure standard	16
4.2	Section 3.4: Cabinets within roads	16
4.3	Section 3.5: Noise from telecommunications equipment	20
4.4	Section 3.6: Masts and antennas	22
5	Letters to the Minister	25
	Appendix A: Public Notice	26
	Appendix B: Index of Submitters	27

Tables

Table 1:	Breakdown of submissions, by source	4
Table 2:	Key themes: summary	6
Table 3:	Summary of key themes, sections 3.3–3.6	7
Table 4:	Analysis of the points raised in correspondence to the Minister	25

Figures

Figure 1:	NES development process	3
Figure 2:	Breakdown of submissions, by source	4
Figure 3:	Breakdown of submissions, by position	5

1 Introduction

1.1 Background

In June 2007 the Ministry for the Environment notified the Proposed National Environmental Standard for Telecommunications Facilities (NES) under the Resource Management Act 1991 (RMA).

Public notices were placed in major papers on 16 June 2007 informing of:

- the subject matter of the proposed NES
- the Minister's reasons for considering the proposals are consistent with the purposes of the RMA
- how people could make a submission
- the deadline for submissions.

A copy of the public notice is included in Appendix A of this report.

Five workshops on the proposed telecommunications facilities NES were held: in Auckland, Manukau, Wellington, Christchurch and Dunedin between 20 and 26 June. Details of the proposals and how they would be implemented were made available during the submission period in the Ministry for the Environment report *Proposed National Environmental Standards for Telecommunications Facilities*.

The deadline for submissions was 5 pm on Friday 10 August 2007.

1.2 Proposed standard

The proposed standard, as notified for consultation, addresses four issues. The issues were set out in the discussion document in sections 3.3 to 3.6.

Section 3.3: Exposure to radio-frequency fields from wireless telecommunications infrastructure

This requires exposures to comply with *NZS 2772.1: 1999 Radio-frequency Fields Part 1: Maximum Exposure Levels 3 kHz–300 GHz* ('the New Zealand Standard'), and proposes a process by which compliance with the New Zealand Standard can be verified.

Section 3.4: Telecommunications equipment cabinets within road reserves

This proposes that telecommunications cabinets in road reserves be permitted activities provided they meet restrictions as to height, volume, siting and clustering. Limits vary depending on whether the cabinet is to be located within a residential, open space or reserve area, or a rural or mixed-use area.

The proposed standard further provides that rules in district plans take precedence over the standard in certain circumstances (ie, when the site of the cabinet is adjacent to a building or

place with heritage or landscape value, or where work is to be undertaken within the drip-line of a tree which would have otherwise required resource consent).

Section 3.5: Noise from telecommunications equipment located within road reserves

The proposed standard makes noise from a telecommunications cabinet a permitted activity provided that specified noise limits are complied with. Distinctions are made between daytime and night-time, and between residential, mixed-use, rural and open space areas, and business and industrial areas. The approach to be taken to measuring noise is also specified.

Section 3.6: Masts and antennas for wireless telecommunications networks within road reserves

This proposes that antennas and their support structures be permitted activities in the road reserve provided the mast or antenna meets certain requirements as to scale.

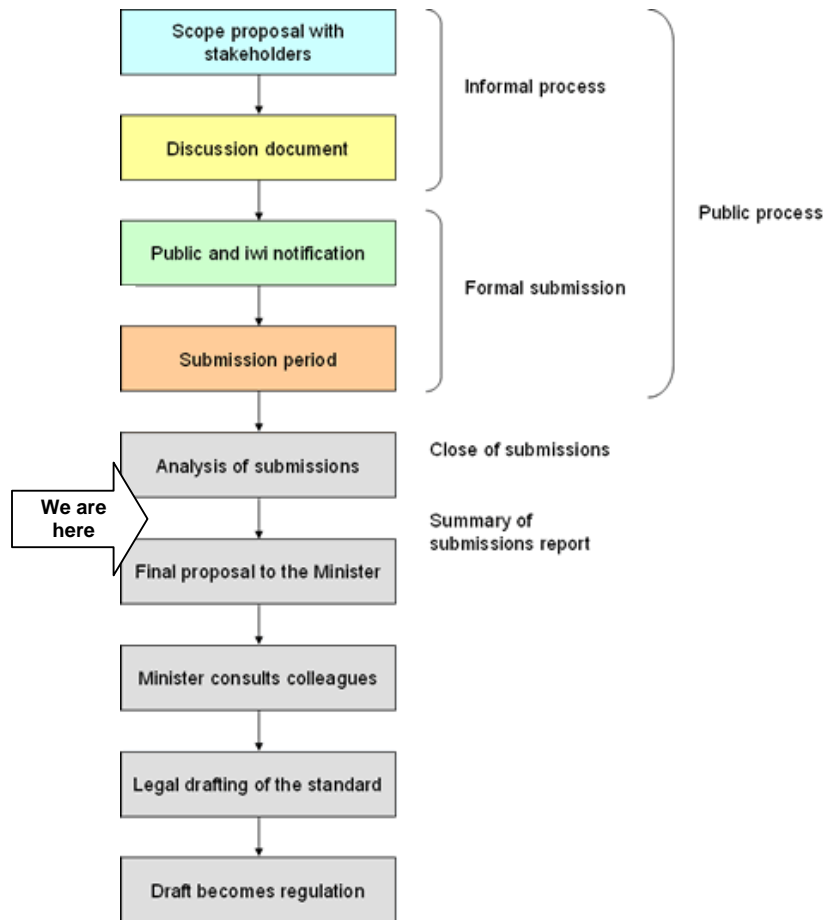
For cabinets, the proposed standard further provides that a rule in a district plan take precedence over the standard where there are heritage or landscape values identified in a district plan.

The discussion document noted that the exact wording of any standard will be legally drafted after government decisions.

1.3 National environmental standard development process

An outline of the NES development process, including the informal and formal submission process, is shown in Figure 1. The Ministry has completed the public process stage, and the release of this *Report on Submissions* marks the end of the submissions stage.

Figure 1: NES development process



Note that the NES development process differs from the district and regional plan and resource consent processes undertaken in accordance with the First Schedule of the RMA. The development of an NES does not involve hearings, and there are also no rights of appeal.

1.4 Purpose

This document presents an overview of the submissions received on the proposed NES for telecommunications facilities.

- Chapter 2 is a summary of the key themes raised by submitters.
- Chapter 3 summarises general comments made by submitters.
- Chapter 4 summarises feedback from submitters on sections 3.3 to 3.6 of the discussion document.
- Chapter 5 summarises the further correspondence received by the Minister for the Environment.

This report is intended to provide a concise summary of the views expressed. It is not intended to provide an analysis of those views or recommendations in response to the submissions. This will be done in a separate report, which will be presented to Cabinet early in 2008.

2 Overview of Submissions

2.1 Summary of submitters' positions

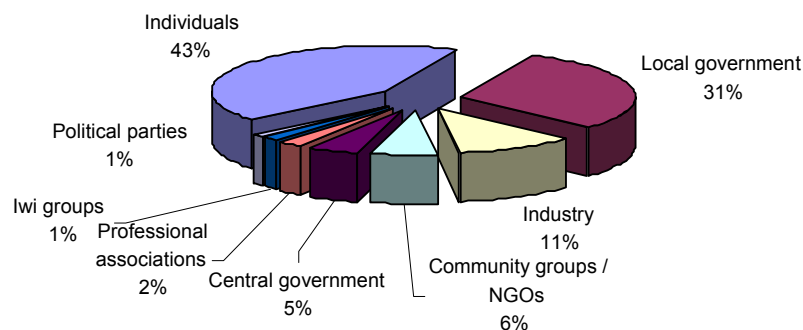
A total of 82 submissions were received. Table 1 presents a summary of submissions by source category.

Table 1: Breakdown of submissions, by source

Category	No. of submissions
Individuals	35 (43%)
Local government	25 (31%)
Industry	9 (11%)
Community groups / NGOs	5 (6%)
Central government	4 (5%)
Professional associations	2
Iwi groups	1
Political parties	1
Total	82

Note: NGO = non-government organisation.

Figure 2: Breakdown of submissions, by source



For the purpose of this summary, submissions were categorised as:

- *standard* submissions – broadly defined as brief submissions (less than two pages) and/or single-point submissions, of which there were 52
- *complex* submissions – submissions touching on multiple parts of the draft standards, of which there were 30.

There is a strong correlation between the submissions of local authorities and complex submissions. Most (but by no means all) individual submissions, on the other hand, are

categorised as standard. A similar analysis of correspondence that was sent directly to the Minister for the Environment can be found in section 5.

2.2 Key themes analysis

The key themes analysis was compiled from all submissions and is broken into three parts.

- the position of submitters is outlined in section 2.2.1
- key themes are summarised in section 2.2.2
- detailed points of submissions on sections 3.3 to 3.6 of the discussion document are summarised in section 2.2.3.

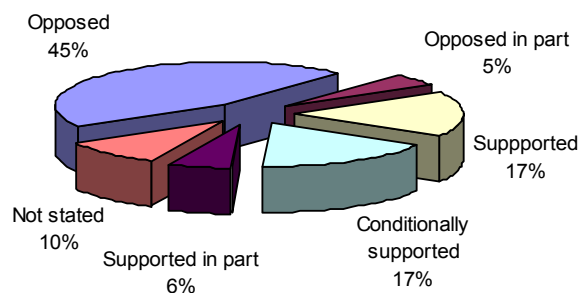
2.2.1 Position of submitters

To best reflect the tenor of submissions they are grouped into six categories: opposed, opposed in part, supported, conditionally supported, supported in part and not stated. Due to the nature of many of the submissions, some interpretation was necessary in applying these categories. However, submissions that did not clearly state their position were only attributed a position where this was obvious from the submission's content and tone.

In particular, it should be noted that conditional support is highly variable, from being conditional on relatively minor matters to relying on very substantive matters (such as a review of NZ2772.1: 1999, or a total rewrite of the standard to have the opposite effect to that proposed). To accurately reflect the level of support for the NES as proposed, submissions that sought changes diametrically opposed to the direction of the proposals have been identified as being in *opposition* even if the submitter did not themselves refer to either support or opposition.

Identification of a submission as being in 'support' does not necessarily mean the submitter did not offer suggestions for improvement, only that the tone of the submission did not suggest that the support was contingent on those suggestions being taken up by the final NES.

Figure 3: Breakdown of submissions, by position



Where the position of a submission was not obvious (or where the submitter explicitly refrained from stating a view because they believed the case for an NES may not *yet* be justified), submissions were categorised as ‘not stated’.

Some care needs to be taken in the interpretation of these summary findings. Clearly the difference between ‘supported in part’ and ‘opposed in part’ is open to some debate, but the distinction is intended to reflect the emphasis of the submission. Broadly speaking, submitters were divided roughly evenly between those who opposed the NES and those whose submissions expressed (or implied) support for at least some parts of the NES (with various levels of opposition to selected proposals).

2.2.2 Key themes

The key themes identified during the analysis of submissions are presented in Table 2. For more detail on these themes, see section 3.

Table 2: Key themes: summary

Key theme	Sub-themes
General health effects	NES ignores the body of ‘scientific evidence’ Should adopt the precautionary principle
Other (non-health) effects	Amenity/visual pollution Cumulative effects not considered Unspecified
Erection of facilities ‘as of right’	Need for individual assessment Lack of opportunity for community involvement
Lack of detailed control	Local rules should apply when justified NES should not address matters relating to local amenity NES should address amenity issues with more detail
Support for general intent of proposal	Acknowledgement of need to improve telecommunications Local interests in digital future
Scope	Clarity of scope/application Breadth and implications of definition of ‘road’ Capture of regional council (and other non-telecommunication) communication equipment
Communication sector change/unbundling	Proliferation/clutter Co-location Need to facilitate competition
Roles and responsibilities	Interaction with road safety legislation Compliance with regional plans
Process	Lack of supporting information, especially cost–benefit analysis Lack of stakeholder involvement

2.2.3 Key themes, sections 3.3–3.6

Key themes derived from specific comments on sections 3.3–3.6 of the proposed NES are summarised in Table 3. For more detail on these themes, see section 4.

Table 3: Summary of key themes, sections 3.3–3.6

Section	Themes
3.3	Specific concern with NZS2772.1 Measurement and compliance Regional council responsibilities
3.4	Concern about size limits Colour and screening Non-telecommunications industry equipment Concern about potential clustering Siting considerations and co-location Exceptions
3.5	Appropriateness of noise limit Measurement concerns
3.6	Concern about size Siting considerations and co-location Responsibility for removal Exceptions

3 General Submission Summary

This chapter summarises general comments by submitters on the National Environmental Strategy. More detailed comments on the individual parts of the standard can be found in section 4.

3.1 Health effects

In terms of the sheer number of submissions, the most dominant theme is a general concern about the potential *health effects* associated with radio-frequency fields, which is mentioned by 22 submitters. It is a general concern in the sense that it is not limited to the specific radio-frequency field exposure standard; it is expressed as a reason why no provision should be made for telecommunications facilities by way of an NES that permits such facilities.

All 22 submitters who raise this general concern *oppose* the proposed NES in its entirety. It is also worth noting that of these 22 submitters, only three make specific reference to the proposed exposure standard for radio-frequency fields (all three express concern with the standard). There was no indication that the other 19 submitters were necessarily aware of the exposure standard or had a particular position on it. Their responses appeared largely instinctive, as opposed to being based on a lack of confidence in the proposed exposure standard.

That said, it is important to record that several of these submitters provide documentation and/or references/web addresses relating to information sources they suggest support claims about the unsafe nature of radio-frequency fields. Various references are made to radio-frequency fields being genotoxic, neurotoxic and carcinogenic, as well as having other physical and mental health dangers. Several submitters relate personal stories of health issues they attribute to radio-frequency (or electromagnetic) fields.¹ A not infrequent claim is that “the only safe exposure level is zero”.

It is important to note that even among these 22 submitters there is considerable variation, from outright opposition (based on a belief that the science on health effects is ‘proven’) to those suggesting that the science is not proven but that knowledge is incomplete and that there is too much uncertainty. This latter group promote application of the *precautionary principle*.

Special mention ought to be made of the submission of the Green Party, which perhaps best represents concern about health effects.

Most of the submissions that relate to general health effects have been categorised as ‘standard’ submissions because almost all only address this single issue.

¹ Some submitters speak generally about electric and magnetic fields rather than specifically about radio-frequency fields, and it is clear that some of the points made relate to extremely low-frequency fields (ELF), which are associated with electricity transmission and not telecommunications.

3.2 Other (non-health) effects

Effects on amenity

Nine submitters express general concern about the potential effects on amenity, including four individual, three local government and two community group submitters. Six of these nine submitters oppose the NES outright, two express conditional support and one supports it in part.

These general submissions are in addition to the many submissions received on *specific proposals* relating to cabinets, masts and antennas that may also be motivated by concern about effects on amenity. For example, a further five submissions express concern with the visual impact of masts and antennas and 13 express concern about the potential effects of the clustering of cabinets (these issues are dealt with again in section 4). Concern about visual impacts also appears to underpin the positions taken on many other issues.

The tenor of the general submissions is that telecommunications facilities constitute ‘visual pollution’. In this context, several local authority submitters note that the discussion document does not acknowledge the New Zealand Urban Design Protocol, of which many local authorities are signatories.

A large number of (mostly local authority) submitters express concern that the NES does not take account of *cumulative effects*. In addition, four submissions refer merely to ‘adverse effects’ without being specific about the nature of their concern; all four oppose the NES.

3.3 Facilities ‘as of right’

Fourteen submitters express opposition to the notion that telecommunications facilities should be allowed ‘as of right’. Several of the 14 submitters perceive the NES to be giving the telecommunications industry a ‘free rein’.

These submissions typically ask that telecommunications facilities not be permitted activities (or should not be permitted in the road reserve, or in residential areas). Others express a similar point by stating that resource consents should be required, or that every case should be treated on its merits. At least one submitter expresses the view that the NES circumvented the democratic process and that the telecommunications industry should have to “play by the rules that others are expected to play by”.

Others go even further by suggesting that there should be public consultation on all telecommunications facilities, with a right of appeal against the local authorities’ decision.

All 14 submitters on this point oppose the NES. There is a close correlation between those who object to the permitted activity status accorded by the proposed NES and those who express general concern about health affects.

3.4 Lack of ability to exercise local control

Another major theme is that the NES does not offer a level of control that is sympathetic and responsive to local issues (several were concerned with various aspects of amenity). The majority (14) of those making this general claim suggest that the NES should allow for control of telecommunications facilities through district plans for reasons beyond those articulated in the proposed NES (heritage, landscape and tree protection).

Eight of these submitters are local authorities, with many repeating the phrase that a ‘one size fits all’ approach is not appropriate. (In addition, a few submissions make the same point in the context of the specific standard for cabinets and/or the standard in relation to masts and antennas).

Two important sub-themes are also apparent:

- cabinets, masts and antennas should be excluded from the NES and dealt with exclusively through local plans
- the NES itself should accommodate provisions that are capable of taking better account of a broader range of amenity considerations.

3.5 Support for the general intent of the proposal

Thirty-three of the 82 submissions either support the NES in whole or part, or support the NES conditionally. This support does not, however, translate to explicit support for the general intent of the proposal. Relatively few (14) submissions explicitly support the objective of the NES as articulated in the discussion document.

Furthermore, explicit support for the objective does not necessarily translate into support for the NES proposal. At least one submission (that of Local Government NZ) explicitly supports the objective but asserts that it is not clear that the NES is the right tool and that, on the basis of the information provided, it is hard to see that the NES is justified.

The discussion document did not ask whether submitters agreed with the general objective and it is likely that most submitters simply omitted to comment on the objective/general intent, focusing instead on their particular point of concern. The higher levels of general support for the NES suggest that the relatively low level of specific support for the objective may be misleading.

It is important to record that only one submitter explicitly states opposition to the underlying objective of the proposal, although a number of other individual submitters do appear to take exception to what they characterise as an effort to give preferential rights to the telecommunications sector. Some local authority submissions also question why the telecommunications sector is being ‘singled out’.

On the other hand, at least three local authority submitters (as well as most business submissions) do make explicit reference to their acceptance of the importance and value of a viable, competitive and comprehensive telecommunications system. Some local authority submitters (including Waitakere City Council, and Bay of Plenty and Auckland Regional

Councils) all provide information explaining their own goals and associated local initiatives (including an ‘information access strategy’, an initiative to develop a community-owned, open-access, regional wholesale duct network, and a regional broadband project) to improve telecommunications within their jurisdictions. Several other submitters (such as Waikato and Marlborough District Councils) acknowledge support for the Government’s Digital Strategy.

3.6 Scope of the NES

Many comments were received on the scope of the proposed NES. These comments fall into three groups.

One group of submissions seek a broader scope. For example, Waikato District Council wants the NES to apply to facilities located on *private property* as well as those on public roads. Arc Innovations Ltd asks that *advanced electrical metering* be included within the NES to ensure an efficient roll-out of that technology.

A second group express concern that the NES might be too broad. This group includes submitters concerned about the breadth of the term ‘road’, and in particular the applicability of the NES to unformed roads. This group also includes the regional council submitters (such as West Coast and Northland Region Councils) and some district councils (for example, Far North District), which express concern about the potential of the NES to capture the regional council-operated telecommunications equipment that serves hydrological monitoring stations, and request that such equipment be explicitly excluded. (Environment Canterbury notes that it does not believe this equipment would be caught by the NES). Similarly, at least one submitter (Marlborough District Council) believes roadside control cabinets associated with ‘primary public utilities’, such as water, sanitation and electricity, will be caught by the NES and that there is a need to distinguish between primary public utilities (which should be excluded from the NES) and secondary utility services such as broadband (which should be addressed by the NES).

The third group believes that there are a variety of matters of scope that need to be clarified. The Resource Management Law Association, for example, submits that the scope of the NES should be stated more clearly (with exclusions made explicit).² This submission (along with the submission of North Shore City) also states that there is a need to clarify whether the radio-frequency exposure standard applies generally or just within road reserves (at present these submitters assert that it appears to apply generally, but appear to assume it is intended to apply only within the road reserve).

Some submitters seek clarification that other statutory requirements will remain unaffected by the proposed NES. The Ministry of Transport, for example, wants it to be clarified that current road safety approval processes will remain in place.

² The RMLA argue that exclusions should include telecommunications equipment or structures outside the road reserve; new free-standing mobile phone transmitters or masts; over-ground or underground wires; permission for leasing road reserve; or opening the road to install new telecommunications facilities.

3.7 Effects of the NES

Many submitters commented on what they perceive to be the uncertain and perhaps unanticipated effects of the NES. These comments centre around three main themes.

First, a number of submitters (mostly local authorities) commented on the potential impact the NES might have on the so-called ‘permitted baseline’ as it applies under the RMA. This concern is based on uncertainty about whether RMA decision-making on other structures and noise-generating activities within the road corridor will be affected by the fact that the NES mandates a certain level of permitted effect.

The second theme is the relationship between the NES and local authorities’ responsibilities under other legislation affecting utilities in the road reserve. This includes both the Telecommunications Act and the Local Government Act. In short, there is concern among at least some local authorities that the NES could somehow restrict the ability of local authorities to address amenity issues when imposing conditions (so called ‘reasonable conditions’) under the road-opening process.

The Local Government NZ submission provides perhaps the most comprehensive summary of these arguments (although several other local authority submissions make the same points).

A final theme, expressed by several submitters, is that the NES will provide an incentive for locating telecommunications equipment on the road reserve rather than on private land. This point appears closely related to a general concern that telecommunications companies will obtain a benefit from the NES at the disadvantage of communities, and that local authorities should receive compensation for occupation of the road reserve (an argument raised, for example, in the submission from Hugh Grierson).

3.8 Telecommunications sector change and unbundling

A general point raised by submitters across all categories relates to a fear that unbundling of the local loop could lead to a *proliferation* of telecommunications equipment, and a consequent increase in cumulative environmental impacts. Individual-level concern about proliferation is most comprehensively set out by Kent Duston, but similar concerns about proliferation (and the inability of the NES to address this potential) are raised by other individual submitters, most forthrightly by Peter Jackson and Frances Walsh and, in a similar submission, by Beth Jones.

The point about the potential for proliferation and the need for *co-location* is also made by some business sector submissions (such as those from Call Plus Ltd and NZ Communications Ltd). Some make the wider point that the NES should be co-ordinated with regulatory developments in the telecommunications sector.

A number of local authorities make similar points.

3.9 Roles and responsibilities

Most regional council submitters note that they are responsible for the beds of lakes and rivers and for the coastal marine area (CMA), and that the NES omits to acknowledge that the control of telecommunications facilities on roads *within* the beds of lakes and rivers or CMA would be

a regional council responsibility. They argue that the NES should make appropriate reference to the provisions of regional plans.

Similarly, Transpower NZ Ltd notes that the NES should clarify that although an activity might be permitted by the NES it could still require consent under a regional plan. Several regional council submitters also question whether the emission of radio-frequency radiation is a regional council function (with Environment Waikato asserting that it is and Environment Canterbury that it is not).

3.10 Alternatives

Although the discussion document did not specifically ask about alternatives, as discussed above many submissions do (either explicitly or implicitly) suggest alternatives. These can be summarised as:

- retention of the status quo
- an NES on noise and radio-frequency fields only
- an NES with more restrictive provisions that recognise and provide for a wider range of amenity values
- greater provision for district plans to be able to override the NES when circumstances justify it
- guidelines.

3.11 Specific questions

Few submitters followed the format of questions set out in section 6.2 of the discussion document. Many of the questions are, however, directly or indirectly answered by the responses recorded in this submission summary. The responses received to specific questions focus on two questions in particular, which are addressed below.

3.11.1 Consent categories

Fifteen responses were received on the question of what consent categories should apply to telecommunications facilities that do not comply with the NES.

Ten responses are from *local authorities*, with two suggesting restricted discretionary, two “as specified in the relevant district plan”, two non-complying (assuming the NES stays as proposed), two non-complying for radio-frequency only, one “controlled or restricted discretionary”, and the final submitter suggesting restricted discretionary for amenity issues and non-complying for radio-frequency and noise.

Three of the responses are from business submitters, with two suggesting controlled and one either controlled or limited discretionary.

The final two submissions on consent categories are from individuals, both of whom proposed the non-complying category.

3.11.2 Analysis of costs and benefits

A wide variety of comments were received on the merits of the cost–benefit analysis. The pattern of responses is largely predictable given other responses.

Business submitters such as Powerco Ltd agree that the NES will have benefits. However, the Radio Network Ltd submission goes further by suggesting that the analysis does not take into account higher compliance costs resulting from the NES having more onerous standards than 82% of plans.

Individual submitters such as Jenni Boulton, on the other hand, suggest that the NES does not take into account relevant costs (such as potential loss of life and property devaluation). Similarly, submitter Beth Jones stresses that there is not enough information and that telecommunications services are treated as being paramount.

In contrast, *local authorities* are more circumspect about the value of the cost–benefit analysis. Several, such as Palmerston North City Council, express disappointment that the full section 32 analysis has not been completed prior to the submission and claim that there is insufficient detail to draw conclusions. Kapiti Coast District Council also claims that the cost–benefit analysis is of limited benefit, while Waikato District Council describes the lack of analysis as a flaw in the process. Others, such as Manukau and Christchurch City Councils, suggest that it is difficult to gauge regulatory impacts because the analysis is not complete and it does not provide justification for singling out telecommunications above other utilities. Grey District Council claims that legal access to the road has been undervalued, and Auckland City Council suggests there has been insufficient analysis of streetscape and amenity values.

3.12 Process

There was some level of dissatisfaction with the process used for the NES development and consultation. Eight submitters (two local government and six individual) state that they feel there has been insufficient consultation.

Comments include:

- disappointment that there was no community involvement (Kent Duston)
- insufficient consultation with local authorities (Far North District Council)
- it is critical that further consultation with local government occur (Local Government NZ)
- concern at the rather narrow group that has been used to develop the NES, and apparent lack of consultation (Northland Regional Council)
- anger at the lack of publicity and public consultation (Patricia St John)
- material put out for public submission had an unreasonably short timeframe (Patricia Christianson)
- the proposal should not proceed without wider consultation (Mary Redmayne).

Others refrained from criticising the process but signalled a desire for, and expectation of, further consultation (Kaipara District and Manukau City Councils)

3.13 Overview of submitter comments by submitter type

In general, the comments of submitters align closely to particular submitter types. The following is aimed at giving an overall impression of submitters' views.

- (a) Individual and community group/NGO submitters tend to oppose the proposed NES on the grounds of perceived health risks and/or concern about potential 'visual clutter' or other infringements of community rights/values.
- (b) Local authority submitters form two sub-groups. Most territorial and unitary authorities express concern about the inability of the proposed NES to recognise and protect the full range of amenity values that could be compromised by telecommunications facilities. These submitters seek (i) retention of the ability for district plans to control telecommunications facilities when such control could be justified locally; or (ii) a narrower NES that does not address cabinets and masts/antennas; or (iii) a more detailed and more restrictive set of provisions in the NES. Regional councils form the other sub-group. These submitters tend to be less concerned about local amenity and more concerned with ensuring their own communication devices are not encumbered by the NES. Consequently, local authority submitters tend to support the NES, in part or with conditions.
- (c) Business submitters also tend to fall into two sub-groups. The first sub-group tends to broadly support the proposed NES, although suggestions for improvement are made (inevitably involving less restrictive standards). The second business sub-group also broadly supports the proposed NES, but expresses more interest in ensuring the standard does not act as a barrier to competition between telecommunications providers.
- (d) Neither of the two professional association submitters express a position on the NES, but they do point out alleged deficiencies and make a range of (largely technical) suggestions for how the proposal can be improved.
- (e) Central government agencies tend not to offer either general support or opposition to the proposed NES, but restrict their comments to their particular area of responsibility.

4 Submissions on Sections 3.3 to 3.6

This section of the report collates feedback from submitters who commented on specific parts of the proposed NES. These parts are headed as sections 3.3 to 3.6 as numbered in the original discussion document for ease of cross reference to the discussion document. Some of these comments duplicate those in more general submissions.

4.1 Section 3.3: Radio-frequency field exposure standard

Key themes of submissions on the proposed permitted activity standard for exposure to radio-frequency fields are: specific concern with NZS 2772.1, measurement and compliance, support for NZS 2772.1, and regional council responsibilities.

- Nine submitters mention NZS 2772.1 specifically as a concern (seven individuals, one community group and one political party).
- Four submitters express concern about how compliance with the standard would be determined (one political party, one individual and two local authorities).
- Thirteen submitters express support for adopting NZS 2772.1 within the NES (eight local authorities, three businesses, one government agency and one individual).
- Three local authorities query whether regional councils have a function in relation to managing radio-frequency emissions.

Two individual submitters also suggest that the precautionary principle should be applied, and two local government agencies comment about the need to ensure that some radio-frequency transmissions are not captured, such as baby monitors and amateur radio transmissions. Note that there were also numerous submissions expressing general health concerns, but not specifically mentioning NZS 2772.1, as discussed in section 3 above.

4.2 Section 3.4: Cabinets within roads

Key themes on the proposed standard for cabinets in the road reserve relate to appropriate size limits, non-telecommunications industry equipment, colour and screening, siting and co-location, clustering, and the scope of exceptions.

4.2.1 Cabinet sizes

Nine submissions express concern about the potential cabinet size (seven local authorities and two individual submissions). Most local authority concern comes from councils with tighter size restrictions than proposed in the NES. Palmerston North City Council, however, opposes the sizes specified in the NES even though the NES will introduce more stringent standards for cabinets than its current district plan (it is concerned that unbundling could lead to proliferation and in that case it would want to revisit its current low level of regulation).

Following is a selection of specific comments.

- Christchurch City supports the 1.8 m height and 2.5 m³ volumes standard in *all* areas, suggesting that there should not be a more generous standard in rural areas.
- Waitakere City Council is concerned at the 1.8 m height and suggests that 1.5 m is a more human scale.
- North Shore City opposes the standard, and while it does not propose an alternative, points to its own more restrictive permitted activity thresholds in its district plan (1.8 m in rural and some business areas and 1 m everywhere else).
- Tasman District Council suggests that the cabinet height should be no higher than existing fences or walls (up to a maximum of 1.8 m). It also suggests that if there is no fence/wall, the maximum height should be (say) 1.2 m.
- Manukau City Council simply describes the cabinet dimension standard as too generous, pointing to a range of amenity and location issues that mean the appropriate scale should vary according to context. Similarly, Kapiti Coast District Council suggests that the dimensions are too large (although no alternative is specified). Auckland City Council expresses concern about cabinet dimensions, claiming “one size does not fit all”, and that appropriate dimensions should vary according to context. Environment Canterbury also considers the size limits are “too generous and may well cause adverse effects even outside of special character/amenity areas”.

Contrary to the general local government view, Marlborough District Council suggests that a 2.1 m height limit is more appropriate.

Comments from non-local government submitters included the following.

- Kordia Group argues that cabinets need to be large enough to enable co-location, otherwise Telecom as first deployer will have a competitive advantage.
- Internet NZ Ltd similarly comments that the cabinet standard would help to facilitate development of the industry.
- NZ Communications Ltd suggests more generous dimensions that promote co-location (they suggest that dimensions include a maximum height of 2.2 m in residential areas and 2.5 m in rural areas, with correspondingly greater volume limits).
- The Telecommunications Carriers Forum submission asserts that the limit on volume should be a limit on *area* (ie, a footprint limit).

4.2.2 Clustering

Thirteen submitters express concern about the potential for cabinets to be ‘clustered’ together (five local authorities, three individuals, two community groups and three business submitters).

Four local authorities make specific suggestions to help avoid clustering.

- Nelson City Council suggests that the NES should state that cabinets shall be located less than 50 mm or greater than 50 m from another network utility cabinet.
- Waikato District Council suggests a 50 m separation distance between cabinets.
- Grey District Council seeks a restriction of one cabinet per 100 m.

- Rodney District Council recommends that the rule governing clustering be based on distance (such as one cabinet per 20 m of road) rather than on a per property basis (as is proposed in the draft NES).
- Bay of Plenty Regional Council suggests that allowing for one cabinet per property “seems excessive”.

Although a number of non-local authority submitters express concern about potential clustering, few offer specific suggestions to address the issue. Jannie Cozens notes that there should never be more than one cabinet per property.

4.2.3 Siting and co-location

Twelve submissions specifically refer to the issue of cabinet siting, expressing concern about footpath obstruction and the need to maintain sight lines for road safety. Four submitters note that the term ‘road lay position’ is not widely understood.

Several local authorities offer some specific suggestions to resolve this concern.

- Tasman District Council suggests that the NES provide that the cabinets not reduce the width of footpaths to less than 1.4 m.
- Waitakere City Council proposes that the NES state that cabinets must be 2 m from the front of the curb.
- Waikato District Council requests that the NES require a 4 m setback from the edge of the carriageway and a 30 m setback from an intersection.

Environment Bay of Plenty (EBOP) suggests a process for achieving co-location. As noted in the general analysis, many further submissions seek greater emphasis on achieving or encouraging co-location (though only EBOP offers specific suggestions about how this could be achieved). Most of those making the co-location point tend to imply that co-location might be best achieved by local authorities retaining greater control.

4.2.4 Screening and colour

Seven submissions address the need to use screening, colour or other ways to minimise the effects on visual amenity (four local authorities, two community groups and one business submission).

- Kapiti Coast submits that the NES should include a restriction “requiring that cabinets be of neutral colour in natural shades”.
- Waikato District Council wants a requirement for cabinets to be “coloured in a recessive hue”.
- Auckland City argues that “any environmental standard should stipulate colour, screening or planting to mitigate adverse visual effects”.
- Nelson City states that “the standards should require the appropriate use of colours, screening and sensitive placement of telecommunications equipment to avoid potential adverse effects on visual amenity”.

4.2.5 Exceptions (where NES standards ought not to apply)

As noted in the general analysis, a significant theme of submissions (particularly among local authorities) is dissatisfaction with the circumstances in which a district plan will take precedence over the NES. In all, 12 submitters raise this specific concern with respect to cabinets (although others make the point more generally). Eight of these are local authorities, two are individuals, one is a Māori organisation and one a professional organisation.

The solutions offered by local authority submitters are described in general terms in section 3.13 of this summary. Specific concerns and comments are outlined below.

- Nelson City Council suggests that the approach (to exceptions) is too limited. Local authorities should be able to have more stringent standards when justified by robust section 32 analysis. Additional areas could include inner city parks and squares, or wāhi tapu areas.
- Waikato District Council suggests that a district plan should have precedence when a cabinet is located adjoining a wāhi tapu site, or a site containing a heritage item listed in a district plan, as well as in other specified instances.
- Environment Canterbury submits that the permitted activity exclusions should also include high amenity streetscape or special character areas, conservation areas and identified hazards.
- Auckland City suggests that context is critical, and that it is not possible to define an appropriate absolute standard for cabinet (and antenna) size or location. Manukau City appears to make a similar general point.
- Auckland Regional Council suggests that the exception be reworded to state “Where a cabinet is located in a road reserve contained within or directly adjacent to any heritage precinct or area of landscape or visual importance identified in a district or regional plan or policy statement”.
- Similarly, Waitakere City Council also submits that ‘exceptions’ should include areas identified as having landscape or heritage values in regional policy statements and regional plans.
- Kapiti District Council suggests that a district plan should have precedence when a cabinet is located in an “area of design or other visual significance”.
- Local Government NZ says it does not believe it is possible for an NES to introduce national standards creating a permitted activity status for cabinets while also ensuring that adverse effects are avoided and/or mitigated.

Several local authorities suggest that the proposed NES will conflict with their own organisation’s under-grounding policies.

Another point made by many submitters is the need to define what is meant by *heritage precincts* or *areas of landscape importance*, as these terms are not currently defined or universally used by local authorities in existing planning documents.

The most substantial non-local authority submission on this point is made by the Telecommunications Carriers Forum, which makes a suggestion for rewording the ‘exceptions clause’. This suggestion clarifies, and potentially broadens, the circumstances in which a district plan should have precedence to include areas “identified in a district plan as having special heritage, landscape, special character or feature value through specific provisions contained in that district plan, and there are associated rules that are more restrictive than the general district plan provisions relating to that zone or road.”

4.2.6 Non-telecommunications industry equipment

Six local authority submitters raise the question of whether other equipment would be captured by the proposed standard. For example, Kaipara District Council points out that other utility roadside structures sometimes use wireless telemetry that could be caught by the standard.

4.3 Section 3.5: Noise from telecommunications equipment

The majority of submitters on the noise standard are local authorities. Only one (Waikato District Council) local authority expresses full opposition to the proposed standard; others are supportive or conditionally supportive. Key themes of submissions on the proposed noise standard are (a) the limit itself and (b) the proposed system of noise measurement.

4.3.1 Noise limit

Thirteen submitters feel that the proposed noise limits are not appropriate in all contexts (ten local authorities, two individuals and one community group).

- Franklin District Council (FDC) wants the Ministry for the Environment to conduct further research into background noise in various residential environments and to refine the proposed noise standards so that they are more appropriate to the particular residential context. FDC further suggests that improved cabinet design could reduce noise levels.
- Manukau City Council submits that the NES should provide encouragement for noise mitigation where practicable, and points out that no justification is provided for why it is proposed to set a different noise level for telecommunications cabinets from that required for other activities.
- Nelson City Council suggests that the standards be amended to reflect different daytime hours for weekends and public holidays; for example, daytime could be restricted to 9.00–22.00 on those days.
- Tasman District Council wants the standard to (a) include hospitals, rest homes and schools in the ‘residential’ category; and (b) require that noise originating from a cabinet in a business or industrial area comply with the residential standard on any adjoining boundary. (Far North District Council also notes this last point.)
- Marlborough District Council simply notes that the adoption of NZS 6802:1999 is supported.
- Christchurch City Council notes that the cumulative sound from a number of cabinets in the same area needs to be addressed. (Others, including Auckland City, make a similar point.)
- Waitakere City Council makes a number of detailed suggestions for change, including a 3 dBA reduction in the daytime and night-time levels in residential areas, and distinguishing between business and mixed-use versus industrial areas (with specific limits of 52 and 42 dBA for daytime and night-time, respectively, suggested for the mixed-use and business areas).
- Rodney District Council seeks the inclusion of a greater range of noise standards that reflect the quiet nature of some residential areas and the noisy nature of some business areas.

4.3.2 Noise measurement

Of the submissions addressing noise measurement, many suggest modifications to the 3 m measuring point. In total, 15 submitters make comments on the matter (13 local authorities and two businesses). It is worth noting that although the details of measurement are disputed, submitters are generally positive about the idea of a noise standard.

Following are some specific comments and suggestions.

- Manukau City Council considers that where buildings are located closer to the boundary than 3 m, it is more appropriate to measure noise from the nearest habitable room.
- Nelson City Council considers the measurement point of 3 m inside a property boundary to be inappropriate. It argues that this has the potential to cause confusion in noise measurement, because all other standards relate to property boundaries (or in some cases a notional boundary). Also, the 3 m figure would be unsuitable where a residential unit or outdoor living area is located within the 3 m point.
- Tasman District Council notes that on some developed properties the 3 m point may not be accessible, and that the point needs to be near the cabinet – not 3 m inside the boundary at the opposite end of the property road frontage (a point also made by Nelson City Council).
- Far North District Council suggests that the method and assessment point match those specified in NZS 6801:1999 and NZS 6802:1991.
- Waikato District Council opposes the noise standard, but, if the standard is retained, seeks that noise be measured at the boundary of any other site, levels be expressed in L_{10} , and levels be as specified in the district plan.
- Auckland City Council wants (a) noise to be measured at any point 3 m from the cabinet and for the measurement point to be unobstructed by buildings; (b) the NES to address the issue of accessibility to private property to undertake measurements; (c) the reference to averaging during daytime to be removed; and (d) the review of averaging provisions or NZS 6802:1999 to be completed before adopting the noise standard.
- Waitakere City Council considers the 3 m measurement approach poses issues and suggests measurement at the property boundary is more appropriate. It also prefers that NZS 6801:1999 not be used (because it does not adequately protect the receiving environment).
- Waimakariri District Council argues for different standards for noise to be measured: 3 m from the cabinet in rural areas but at the boundary in residential areas.
- Consistent with other local authority submitters, Palmerston North City Council also seeks to retain the ability to measure noise levels at the boundary.
- Christchurch City Council notes that the proposed measurement approach does not comply with NZS 6802:1999 and is inconsistent with most district plans.
- Similarly, and in contrast to Auckland and Waitakere cities, Rodney District Council submits that the basis for assessment of noise should be NZS 6802:1999.
- The Local Government NZ submission notes that the key differences between the proposed standard and many district plan rules is the 3 m measurement point, the use of L_{eq} (rather than L_{10}), and the application of the same noise limit for Sundays. Its submission echoes the comments of other local authority submitters noted above.

4.4 Section 3.6: Masts and antennas

Thirty-nine submitters make some reference to the antenna and mast standard. The main issues raised relate to size limits (including concerns about ‘height creep’), responsibility for removing disused antennas, the automatic right to erect (and the limited exceptions for local control), whether dish antennas should be allowed, general concerns about visual impacts, and uncertainty about the wording of the standard.

4.4.1 Size limits

Eight submitters (six local authorities and two individuals) express concern about the size of masts and/or antennas allowed by the proposed standard. Most of these seek a reduction in the size limit.

Many of the comments are in a similar vein to those relating to cabinet sizes. In short, local authorities tend to the view that the appropriate height and dimensions will be location- and context-specific. Some specific comments are as follows.

- Kapiti Coast District Council suggests that the standards are too large to be appropriate in all circumstances (particular concerns are expressed about panels). In addition, a 3 m extension to the height of a lamppost can be unsightly and highly visible from a wide area. The council strongly opposes the standard.
- Christchurch City Council says that “some justification should be provided for the 50% increase in the diameter and the 3 m extension above existing structure to which it is attached. Both, in normal circumstances, seem excessive.”
- Palmerston North City Council is also concerned about the 50% increase in size.
- Environment Canterbury “considers that the size limits are generous and have not been justified”.

Trevor Pollock, an individual submitter, seeks for there to be no additional structure for telecommunications purposes, and a replacement structure limited to 400 mm in width or depth and not exceeding the height of the structure it replaces. The same submitter requests that antenna assemblies not cause the maximum structure to exceed 400 mm nor extend more than 1 m above the structure. Jeannie Cozens, another individual submitter, regards the 3 m additional height standard and 2.3 m wide panel standard as “totally unacceptable”.

Three of the eight submitters referred to above also express concern about the potential for what several termed ‘height creep’. A further six submitters who did not express concern about the size limit itself also referred to concern about height creep. (In total nine submitters – eight local authorities and one professional association – raise this issue.) Height creep is the potential increase in height regarded as possible given the current wording of the standard. The nine submitters who identified this issue point to the absence of a maximum height limit, and suggest that, under the standard as written, telecommunications providers will be able to add 3 metres in height to existing structures on multiple occasions, enabling incremental ‘creep’ over time.

As might be expected, business submitters make rather different points. Kordia Group Ltd and CallPlus Ltd suggest that the standard should allow (a) side mounting of antenna panels and dishes to allow multiple operators to achieve coverage; and (b) for antennas of 0.3 m on end-user premises.

Arc Innovations Ltd believes there is a need to clarify (a) what is meant by ‘diameter of the structure’ (whether this includes cross-arms etc) and (b) the definition of ‘panel antenna’ (including a definition of the permitted size of diameter).

The Telecommunications Carriers Forum submission makes a number of detailed suggestions on the precise wording to be used in the standard. It also suggests a reformulation of the standard so that it differentiates between structures less than 10 m and those greater than 10 m high. For structures greater than 10 m, a 15 m maximum height (with added antenna) is proposed. (This would seem to aim at avoiding the height creep issue.)

4.4.2 Responsibility for removal of antennas

Four submitters (two individuals, one community group and one local authority) express concern about who should be responsible for the removal of antennas if they need to be removed (for example, if they become obsolete or present an obstruction).

- Kent Duston suggests that “inevitably, some of the new entrants (and perhaps some of the older ones as well) will fail commercially. The results of their bad investments – the masts and antennas – will litter the poles ... there is no legal obligation to remove old, unwanted or obsolete equipment”.
- Alastair Fox similarly notes that there is “no requirement for utility providers to make good when services or equipment is no longer required”.
- The West Coast Beaches Protection Society also notes that there is no comment in the standard on how redundant structures are going to be handled. The community has a number of failed projects and redundant structures left from past ventures. “They linger on littering the landscape. These considerations should be provided for in the standard.”
- Grey District Council notes that “there are issues around maintenance or removal of the poles if an antenna has been installed or becomes an obstruction to maintenance. All costs must be a full cost on the telecommunications provider.”

4.4.3 Right to erect, and limited exceptions

As noted above, local authority submitters make comments in relation to masts and antennas similar to those made in respect of cabinets; namely, that a ‘one size fits’ all approach is not appropriate and that the standard should provide more scope for district plans to control the size and location of masts and antennas.

Although many local authority submitters express concern (and some outright opposition) about the limited opportunity for district plans to exercise control, few suggestions are made for refining the standard (and its relationship to district plans). One such suggestion is, however, made by Environment Bay of Plenty, which suggests that councils should have discretion where additional height represents a significant percentage increase in the overall height of the structure. A threshold of “3 m over the current structure or a 15% increase in height, whichever is the smaller” is suggested. The same submitter also suggests that flat-panel antennas be limited to location against large flat surfaces.

Several individual submitters oppose masts and antennas being permitted in residential areas, often for different reasons. Jenni Boulton, for example, opposes them out of concern about health effects. John Fox voices similar concern. Kent Duston’s opposition is based on concern for amenity, and he mentions less obtrusive alternative wireless technologies (requiring base stations in individual houses).

Peter Jackson, Frances Walsh and Beth Jones oppose the standard, but say if it is to be retained there should be a minimum 20 m between antennas and dwellings. Again this seems to be based on concern about the lack of knowledge about (health) effects.

The Telecommunications Carriers Forum submission also makes a suggestion about how the exceptions (ie, district plan precedence) should apply. This suggestion follows the same formula given in relation to cabinets.

4.4.4 Other matters

Submitters make a range of other points with respect to masts and antennas, including the following.

- Grey District Council feels there needs to be an assessment of the structural integrity of the structure.
- Local Government NZ expresses concern about the RMA/Telecommunications Act interface.
- Several local authorities see a need to promote co-location.
- Six submitters feel the standard should include dish antennas (and one submitter states that it should not). One local authority submitter suggests a size limit of 200–300 mm. The Telecommunications Carriers Forum submission suggests a 380 mm diameter limit.
- The standard should exempt regional councils who use antennas for collecting data.

A number of submitters also expressed general concern about visual effects.

5 Letters to the Minister

Seventeen letters were sent to the Minister for the Environment about the proposed NES. The correspondence was outside the period for making submissions, but the nature of the correspondence is summarised here for completeness.

All correspondents are individuals who express opposition to the proposed standard. In the majority of cases the primary point is a general concern about the potential health effects of wireless technology.

A breakdown of the issues raised is provided in the table below.

Table 4: Analysis of the points raised in correspondence to the Minister

Points raised	No. of times the point was made
General non-specific opposition	2
Concern about the health effects of wireless technology	16
Insufficient consultation about the proposed NES	6
Concern about amenity effects – of antennas on poles	4
– general	2
Need to remove surplus equipment	2
Concern that antenna numbers are unrestricted	2
Effect of NES is removal of right to be consulted	5

The table above utilises the same categories as those established for the submissions in previous sections of this report, which enables the points raised in Ministerial correspondence to be compared directly to the submissions. The correspondence can thus be analysed together with the submissions when the proposed standards come to be evaluated in the light of submissions.

Appendix A: Public Notice

The following public notice appeared in regional and national newspapers on 16 June 2007. Newspapers containing the public notice were: *Waikato Times*, *BOP Times*, *Daily Post*, *Dominion Post*, *Marlborough Express*, *Nelson Mail*, *Greymouth Star*, *Southland Times*, *Hawkes Bay Today*, *Otago Daily Times*, *Northern Advocate*, *Press*, *NZ Herald* and *Gisborne Herald*.

National Environmental Standard for Telecommunications Facilities: Call for Submissions

In accordance with section 44 of the Resource Management Act (1991), the Minister for the Environment gives notice of their intention to develop a national environmental standard (regulations) telecommunications facilities.

The intent of the proposed national environmental standards is to regulate specific elements of telecommunications infrastructure that will assist with the sustainable management of New Zealand's telecommunications resources. This is consistent with the purpose of the Act as it will promote the use and development of telecommunications networks in a way that enables people and communities to provide for their social, economic and cultural wellbeing, and their health and safety. It would do this by setting standards (subject to specified limitations) for:

- the emission of radio-frequency fields from telecommunications facilities
- the installation of telecommunications equipment cabinets within roads or road reserves
- noise emitting from telecommunications equipment cabinets located within roads or road reserves
- the installation of masts and antennas within roads or road reserves.

A discussion document outlining the subject matter and rationale of the proposed standards has been produced by the Ministry for the Environment to help people make submissions. This document can be viewed at the Ministry for the Environment, Environment House, 23 Kate Sheppard Place, Thorndon, Wellington, and online at www.mfe.govt.nz.

If you would like a hard copy of the discussion document, free copies are available by emailing your request to publications@mfe.govt.nz or by phoning (04) 439 7467.

Any person can make a submission on the subject matter of the proposed standard. Please include the following information in your submission:

1. your name and postal address, phone number, fax number and email address (if applicable)
2. that you are making a submission on the proposal to develop national environmental standards for telecommunications facilities
3. whether you support or oppose the proposals as detailed in the discussion document
4. your submission, with reasons for your views
5. any changes you would like made to the proposed standard as detailed in the discussion document
6. the decision you would like the Minister for the Environment to make.

Please send your submission to the Ministry for the Environment, PO Box 10-362, Wellington, or email to standards@mfe.govt.nz, by 5.00 pm on Monday 10 August 2007.

Appendix B: Index of Submitters

Key to categories

lg	local government
i	individual
b	business
cg	central government
c	community group or NGO
pp	political party
pa	professional association

No.	Contact name		Organisation	Category
1	Nicolaas	Francken	Sunny Side Up Ltd	i
2	Joanna	Piekarski		i
3	Leah	Alexander	Franklin District Council	lg
4	Elizabeth	Alington		i
5	Marty	Thomson	New Zealand Police	cg
6	Caroline	Cavanagh		i
7	Noeline	Gannaway		i
8	Blair	King	Kaipara District Council	lg
9	Pavan	Sharma	Ministry of Transport	cg
10	Betty and Alan	Gilderdale		i
11	Kent	Duston		i
12	Elly	Mailisi		i
13	Sheri-Ann	Atuahiva		i
14	Kieran	Hegarty		i
15	Pauline and Dean	Carter		i
16	Sally	Gilbert	Ministry of Health and National Radiation Laboratory	cg
17	Pat	Holm	Manukau City Council	lg
18	Cilla	Bennett		i
19	Reuben	Peterson	Nelson City Council	lg
20	Neil	Jackson	Tasman District Council	lg
21	Lou-Ann	Ballantyne	Far North District Council	lg
22	Denise	Ward	Environmental Protection of Children Trust	c
23	Lillie	Sadler	West Coast Regional Council	lg
24	Hugh	Grierson		i
25	Jenni	Boulton		i
26	Trevor	Pollock		i
27	Sue	Kedgley	Green Party of Aotearoa New Zealand	pp
28	Blair	Dickie	Environment Waikato	lg
29	David	Hattam	Kapiti Coast District Council	lg
30	Kate	Mackness	Waikato District Council	lg
31	Simon	Clarke	Arc Innovations Limited	b
32	Beverley	Hughes	Environment Ngati Awa	lg
33	Michael	McQuillan	Auckland City Council	lg
34	Alastrair	Fox		i
35	Penelope	Hargreaves		i
36	Steve	Goodfellow		i
37	H. A.	Turbott	Western Coast Beaches Protection Society	c
38	John	Elvy	Marlborough District Council	lg
39	Andrew	Willis	Environment Canterbury	lg
40	Stephen	Moore	Kilbirnie–Lyal Bay–Rongotai Resident Assn.	c
41	Jonathan	Pereira		i

No.	Contact name	Organisation	Category
42	Terence	Moody	Christchurch City Council
	Weng Kei	Chen	lg
43	Claire	Graeme	Department of Conservation
44	Frank and Julia	Quirke	i
45	Kyle	Balderston	Waitakere City Council
46	Ben	Morgan	i
47	Stewart	Knowles	Window Association of New Zealand (Inc)
48	Ian	Hunt	i
49	Miguel	Fuertes	i
50	Poul	Israelson	Vodafone New Zealand Limited
51	Karol	Helmkink	Resource Management Law Association
52	Rose	Beauchamp	i
53	David	Laurie	Transpower New Zealand Limited
54	Simon	Markham	Waimakariri District Council
55	Basil	Morrison	Local Government New Zealand
	Kerry	Pendergast	
	Dianne	Hale	lg
56	Vaughan	Cooper	Northland Regional Council
57	Karen	Frew	Powerco
58	Alex	Tan	b
59	Trevor	Mackie	i
60	Mel	Sutherland	North Shore City Council
61	Liz	Thomas	Grey District Council
62	Susan	Wells	Living Streets Aotearoa
63	John Fox	Worthington	Telecommunications Carriers' Forum
64	Graham	Walmsley	b
65	Matthew	Mackay	CallPlus
66	Miles	McConway	Palmerston North City Council
67	Tex	Edwards	Environment Bay of Plenty
68	Margaret	Malcolm	NZ Communications Ltd
69	Patricia	St John	Auckland District Law Society
70	Jeannie	Cozens	pa
71	Susie	Stone	i
72	Jordan	Carter	Kordia Group
73	Mark	Bailey	InternetNZ
74	Sunita	Hunt	Southland District Council
	Gavin	Dench	lg
75	Anthony	Opie	i
76	Beth	Jones	i
77	Peter	Jackson	
	Frances	Walsh	i
78	Geoff	Berry	The Radio Network
79	Mary	Redmayne	b
80	Pat	Christianson	i
81	Janine	Bell	Auckland Regional Council
82	Peter	Vari	Rodney District Council
			lg
		Ministerial	Correspondence
1M	Penelope	Foster	i
2M	Michel Rose	Von Dreger	i
3M	John	Lee	i
4M	Colin	Hewens	i
5M	David	King	i
6M	Lethea	Erz	i
7M	Victoria	Davis	i
8M	Craig	Palmer	i
9M	Yolande	Light	i

No.	Contact name		Organisation	Category
10M	Mr J	Carapiet		i
11M	David	Yates		i
12M	Molly	Callaghan		i
13M	Benjamin	Parsons		i
14M	Steven	Long		i
15M	Deborah	Mainwaring		i
16M	Shari	French		i
17M	Chris	Williams		i