

Submission from Living Streets Aotearoa

on the National Environmental Standards for telecommunications facilities

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About Living Streets Aotearoa

Living Streets Aotearoa (LSA) is a national organisation with a vision of "More people choosing to walk more often and enjoying public places – young and old, fast and slow, walking, sitting and standing, commuting, shopping, between appointments, for exercise, for leisure and for pleasure."

The objectives of LSA are:

- to promote walking as a healthy, environmentally-friendly and universal means of transport and recreation
- to promote the social and economic benefits of pedestrian-friendly communities
- to work for improved access and conditions for walkers, pedestrians and runners e.g. walking surfaces, traffic flows, speed and safety
- to advocate for greater representation of pedestrian concerns in national, regional and urban land use and transport planning.

For more information, please see: <u>www.livingstreets.org.nz</u>

Submission

Living Streets Aotearoa opposes the two standards relating to the installation of telecommunications equipment cabinets, masts and antennas which say:

- the installation of telecommunications equipment cabinets alongside roads or in the road reserve will be a permitted activity, subject to specified limitations on their size and location
- the installation of masts and antennas alongside roads or in the road reserve will be a permitted activity, subject to specified limitations to height and size.

Living Streets does not want to see any equipment – cabinets, masts or antennas - installed on footpaths where they will cause obstructions to foot traffic. Foot traffic includes young people, elderly people, people with vision and mobility impairments, mobility scooters and wheelchairs, baby buggies and children's scooters.

There are already many obstacles on footpaths which may inconvenience and endanger pedestrians. These include sandwich boards, outdoor furniture, sign posts, retail outdoor displays, post boxes, bus shelters, bollards, cycle stands and lamp posts. If these things are well positioned, leave plenty of space for foot traffic, and take into account the special needs of vision impaired people, they do not cause too many problems, and in some cases add to the interest, convenience and vibrancy of the environment.

However, where there are too many obstacles, they cause clutter on the footpath and can endanger pedestrians who may bump into them, trip over them, or even have to detour onto the road to get around them.

Living Streets notes that once equipment is permitted to be erected on footpaths, it is very difficult to get it removed again. One example of this is the national Mail Boxes which have been out of use for some considerable time, but have not been removed from footpaths.

Living Streets requests that

either:

telecommunications equipment cabinets, masts and antennas are not a permitted activity where they would be erected on footpaths

or:

that the wording of the standards be amended to read:

• the installation of telecommunications equipment cabinets alongside roads or in the road reserve will be a permitted activity, subject to specified limitations on their size and location,

particularly to ensure that they do not cause undue clutter on footpaths or cause any obstructions to foot traffic.

• the installation of masts and antennas alongside roads or in the road reserve will be a permitted activity, subject to specified limitations to height and size and location, particularly to ensure that they do not cause undue clutter on footpaths or cause any obstructions to foot traffic.

Thank you for the opportunity to make a submission.