



17<sup>th</sup> August 2018

Planning Standards Team  
Ministry of the Environment  
PO Box 10362  
Wellington 6143

Email via: [planningstandards@mfe.govt.nz](mailto:planningstandards@mfe.govt.nz)

Dear Planning Standards Team

**Submission on First set of National Planning Standards – Vodafone New Zealand Limited**

Vodafone is New Zealand's largest mobile phone operator, and second largest Internet Services Provider. Beginning operations in 1998 with 138,000 customers, we now have 2.4 million Kiwis using our services. Each day our customers make over 7 million mobile calls and send 13 million TXT messages. In a month, they use 4,500 terabytes of mobile data (that's more than 2 million uploads of photos to Instagram) and 55,000 terabytes of fixed line data. To provide coverage across New Zealand, we have built a network of 1560 cell-sites from Cape Reinga to Bluff, covering 98.5% of locations where Kiwis live, work and play.

Because our customers are at the heart of what we do, we have invested over \$1 billion in building and upgrading this mobile network. As the first telco to introduce 2G, 3G and then 4G, we have a proud history of investing in innovative technology to deliver faster data speeds. Since 2012, we have partnered with the Government in helping ensure rural New Zealanders can access better mobile coverage and data speeds through the Rural Broadband Initiative. As telecommunications continue to evolve, we have also begun trials of 5G network technology, and developed platforms to support the nascent Internet of Things (or Machine to Machine) applications that will create massive change to our economy.

Our commitment to providing telecommunication services across New Zealand, is matched by our commitment to supporting communities across New Zealand. In 2002 we established

████████████████████  
████████████████  
████████████████████



the Vodafone NZ Foundation and have subsequently donated \$25 million to communities in need. The Foundation is also home to our Instant Network, a suite of mobile devices that allows specially trained staff to establish local communications networks in disaster situations. Recent examples include the Christchurch earthquake, and the tropical cyclones that have wreaked havoc in Vanuatu and Fiji.

Our experience in delivering telecommunications technology (we operate in 30 countries around the world) means we are well placed to participate in discussions regarding National Planning Standards.

Presently, the telecommunications industry is partially enabled to upgrade the existing networks and build new facilities in the road and rural areas throughout New Zealand within the perimeters of the permitted standards within the National Environmental Standards for Telecommunication Facilities Regulations 2016 (NESTF). The S32 report, page 5, on the NESTF recognized the following benefits:

*“The main benefits associated with the proposed NESTF Regulations 2016 are:*

- *national consistency and certainty for the telecommunications industry*
- *reduced consent processing and compliance costs*
- *reduced time delays for infrastructure deployment*
- *enabling New Zealanders to realise the benefits of UFB and RBI sooner.*

*The efficiency gains for the telecommunications industry and local government will also enable them have more time and resources to invest elsewhere. Improved telecommunication coverage and services will also contribute to the economic and social well-being of businesses and communities.”*

The NESTF has been successful in achieving national consistency and certainty for the industry. However, as a national network utility building new infrastructure fixed line and mobile across New Zealand we still rely on regional and district plans to enable new networks, primarily outside the road reserve and in urban areas. Consequently, we are heavy users of planning documents as we seek to evaluate each site as to what is permitted or where resource consents are required. This creates a range of issues including:

████████████████████  
████████████████  
████████████████████



- Variation layout of planning documents, limited use of electronic plans, wide use of PDF documents that make it difficult to navigate planning documents;
- Variation in build costs from district to district because the variation in rules leads to bespoke solutions for each site due to wide variation in district plan provisions and thresholds as when a resource consent is required;
- Time delays in the site acquisition and build programmes due to having to undertake complex planning assessments or resource consent applications, and the time a council takes to process and consider an application;
- Uncertainty of outcomes where telecommunications infrastructure and/or associated installation activities are not permitted;
- Planning restrictions, which may reduce optimisation in the design of the network resulting in increased inefficiencies, network risk and sometimes a less than optimal service experience for our customers. Or that potential users miss out because the facility must be constructed at a height, to meet permitted standards, that is too low to provide coverage of the full potential user catchment;
- Time and cost of submitting, attending hearings on each Plan review process. We tell a consistent story but often achieve inconsistent outcomes. Too be fair our intensive engagement processes and collaborative efforts are starting to achieve greater consistency of District Plan provisions, but it is an on-going and demanding process with no certainty of outcome;
- Councils face costs for staff time required to prepare telecommunication and network Utility provisions in District Plans that are technical and have been described as “boring” to prepare and work on. The resource cost of staff or consultant to process and monitor resource consents and enforce district plan provisions;
- Delays and uncertainty in building new or upgrading our telecommunication networks and technology affect our customers that rely on communications technologies to be competitive internationally, or other users being able to fully realise the benefits of improved telecommunication coverage and services.





## **Draft first set of National Planning Standards**

Vodafone supports the draft first set of National Planning Standards. We have some suggestions for amendments and some additional definitions.

## **Development of additional National Planning Standards**

Vodafone supports the development of additional National Planning Standards. Vodafone supported the Ministry for the Environment establishing the working group in August 2016, to explore the opportunities to develop a National Planning Standard for Infrastructure. The working group continues to work on the preparation of what is now a National Planning Standard for Network Utilities (NPSNU).

The concept for the working party was generated via submissions to the Resource Legislation Amendment Bill 2016. That suggested potential content for the National Planning Template (NPT). Of the range of suggestions put forward, topics relating to infrastructure and utilities are commonly raised. Submissions included the following comments:

- High costs associated with submissions on multiple District Plans, generating a large amount of duplication;
- Welcome consistency in resource management plans and policy statements structure and format. In order to reduce complexity and improve the clarity and user friendliness of plans;
- Providing a level of consistency in definitions and terms would be beneficial;
- Protection of network facilities, such as the national grid, from inappropriate development;
- Reverse sensitivity was raised as an issue.

During the Auckland Unitary Plan and the Christchurch Replacement Plan review processes, many of these network utility providers worked cooperatively together in support of these plan reviews. In both plan reviews, the network utility providers participated in mediation sessions and have been required to work together to achieve workable provisions for their respective activities. Because of the industry specific technical requirements and knowledge required about each network, Councils have been seeking out guidance on what is required

████████████████████  
████████████████  
████████████████████



to support network utilities. Collaborations in a range of plan reviews have significantly improved the provisions, reduced time and resources required to prepare network utility chapters for Councils and the industry.

NPSNU working group has representatives from Local Government NZ being Christchurch City, Water Services, Wellington Water; Transpower, Electricity Networks Association (ENA) being Vector, PowerCo and Aureroa; National Transport Agency, Kiwirail, First Gas, and Telecommunications Carrier Forum (TCF) being Spark and Chorus and independent Resource Management consultant Ainsley McCleod. MfE continues to support the working group but the work is currently outside the first Planning Standards programme of work. The output of the working group will be a full content Regional Policy Statement and Network Utilities chapter. The working group has been sharing and testing content with key groups that generally have an interest in network utility provisions in district plans. Over the last few months workshops were held with the rural sector and a number Councils currently developing district plans in Canterbury, Wellington and New Plymouth. The feedback received was supportive and has been used to enhance the provisions specially to ensure that core services such as public transport including roads, cycling and walking, the 3 waters plus other council networks were appropriately enabled.

NPSNU working group working closely with MfE has been able to essentially road test the first planning standards, including using the F-5 draft chapter from standard. Our comments are based on the experience of using a range of the draft planning standards, with a focus on the standards for Infrastructure and Energy Chapter provisions.

### **Standardised structure of document**

The following draft standards provide the opportunity for those of us that have to use every regional and district plan document in New Zealand to know and understand the layout and how the plan is going to work in relation to other chapters or National Environmental Standards:

████████████████████  
████████████████  
████████████████████



S-RPS: Regional policy statement structure standard, S-DP: District plan structure, standard, S-CP: Combined plan structure standard, S-IGP: Introduction and general provisions standard – Part 1 of all plans and policy statements and S-DWM: District wide matters standard – Part 4 of District plans.

Vodafone supports the proposals in each of the standards. It is good to see that Councils, that have already completed recent Plan reviews, have 7 years to transition to the planning standards format.

The use of discretionary direction for zones is appropriate, as it enables the right level of pick and mix depending the type/scale of City or District that the planning document covers.

The requirement for a colour palette as per Table 21 on page 54/55 does not recognize the cost of printing colour and environment issues. Our environmental sustainability policies prioritize printing in black and white. In our opinion the planning standard needs to require the ability to print in black and white. Therefore, a white and black palette of symbols or abbreviations needs to be developed. This should not be overly complicated, given that plans were until recently all in black and white. The colour palette, especially when printed, is not always easy to read without symbols, to aide in the clarification of the zone type.

The requirement to outline details of which rules are more lenient or stringent that the NES under S-IGP table 15 is supported. This will provide clarity for plan users.

### **F-1: Electronic accessibility and functionality standard**

Currently 97% New Zealanders have the ability to access electronic planning documents. Mobile and fixed line access via the rural broadband and ultra-fast fibre projects, lead to the ability to access just about anywhere in NZ. Access is continually being improved by the roll-out of new technology and networks, the next being 5G. The requirement transition to electronic plans is critical for New Zealanders and will significantly improve access to planning document and the planning process for everyone. Users will be able to access the document when they want and read the information relevant to any proposal they are considering. This will significantly reduce the time it takes and improve access to the right information.

████████████████████  
████████████████  
████████████████████



Consequently, this will improve our ability to assess our telecommunication projects across the New Zealand.

### **F-2: Mapping standard, F-3 and F-4: Spatial planning tools (District) standard**

The requirement to have printed maps should be a discretionary requirement. An electronic plan provides the ability to print material relevant to a particular project, including the plans. For Councils that continue to use PDF documents, the requirement to have printed plans/maps is important.

### **F-5: Chapter Form standard & F-6: Status of rules and other text and numbering form standard.**

Part of the work that has been completed for the development of the NPSNU, is the use of the standard template format in F6. Our experience of transferring the information from a Christchurch District Plan type of format to the new layout, is that it is a reasonably comprehended document that is easily understood. The user is able quickly understand the status of the activity, or what happens if the rules are infringed.

### **CM-1: Definitions standard**

We consider that the following definitions need to be add or altered. During the drafting the NPSNU document a wide range of new definitions or alteration will be required to ensure that the NPSNU functions and is interpreted as intended.

We consider that it is too narrow only to recognise “functional need”. “Operational need” should also be included as in the Auckland Unitary Plan and Christchurch District Plans.

*The need for a proposal or activity to traverse, locate or operate in a particular environment because of technical or operational characteristics or constraints.*

The definition of “Height” while simple to read, is very open for interpretation and will potentially trigger a lot of consequential plan changes to height rules in plan function. The definition is in direct conflict with how height is measured under NESTF 2016 Regulation 7(6).

████████████████████  
████████████████  
████████████████████



We consider that this conflict should be recognised and resolved potentially by the inclusion of the NESTF height measurement regulations.

### **Designations format**

We consider that the format and information requirements for designation is appropriate. This will ensure everyone has access and knowledge about what a requiring authority can do on a designated site.

### **Future content for standards – Utilities provisions**

We support the development of content standards such as the draft NPSNU that is currently being developed. Network utilities are core infrastructure that all new Zealanders depend on. There should be consistency of the regulatory framework but recognising that geographical variation of standards in appropriate circumstances. Such as, how telecommunication facilities or mobile sites are permitted in the Queenstown Lakes District outstanding national landscape or on the Canterbury plains. We consider that the NPSNU should resolve the issues we identified on page 3 of this submission. A collaboration between the technical experts and local and central government with drafting controlled by an independent expert. Plus inputs and comments from other stakeholders, means that what is often seen as a technical and “boring” chapter to prepare by planners writing Plans, is replaced by the draft NPSNU. In addition it resolves the difficult issue of integrating the NESTF 2016 into district plans for telecommunications provisions for telecommunication operators that do not rely on the NESTF 2016 such as Councils.

Yours sincerely,

Colin Clune

Resource Management Planner

The address for service is:

████████████████████  
████████████████  
████████████████████





Colin Clune

[Redacted]

[Redacted]

[Redacted]

Please direct enquiries to:

Colin Clune

Resource Management Planner

Tel [Redacted]

Email [Redacted]

[Redacted]

[Redacted]

[Redacted]