17 August 2018

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

By email: planningstandards@mfe.govt.nz

Dear Sir/Madam,

2degrees Submission – Draft National Planning Standards

1. Introduction

2degrees supports the draft set of National Planning Standards (Planning Standards) as a nationally consistent template. As a network operator continuously investing in mobile and fixed networks across New Zealand, we are actively engaged in the planning process and rely heavily on effective regional and district plans to build and operate our network.

We set out below an overview of our experience with the current planning environment (section 2) and comments and suggested amendments regarding specific Planning Standards (section 3) for your consideration as part of this consultation process.

2. Current planning environment

The National Environmental Standards for Telecommunication Facilities Regulations 2016 (NESTF) enables 2degrees to more effectively and consistently upgrade and develop our existing networks in roads and rural areas throughout the country. However, we still experience a range of issues relating to the significant variation in planning documents throughout New Zealand, including:

- Variations in the layout of planning documents.
- Limited use of electronic plans. Instead, PDF documents are common, making it difficult to navigate planning documents.
- Variation in build costs between districts due to inconsistencies in district plan rules and resource consenting thresholds, which require us to develop bespoke solutions for each site.
- Planning restrictions which require network operators to compromise on the design of the network creating inefficiencies and network risk.
These issues have resulted in:

- **Time delays** - as we must undertake complex planning assessments, resource consent applications and are frequently required to attend hearings on each plan review process. Such delays directly affect our customers by delaying 2degrees’ ability to upgrade or extend available services.

- **Less than optimal service for network users.** For example, height restrictions often mean that coverage is not provided to the full user catchment, impairing users’ ability to take advantage of the benefits of improved wireless coverage and services.

- **Inconsistent outcomes** across New Zealand, which also creates business uncertainty.

- **Unnecessarily high costs** for both network operators and Councils.

3. **Structure Standards**

   **General comments**

   2degrees supports the proposals in the Planning Standards. These enable users who must navigate multiple district and regional plans to understand how the plans relate to the National Environmental Standards.

   2degrees agrees that it is appropriate that Councils who have recently completed plan reviews have seven years to transition to the new Planning Standards.

   **S-ASM: Draft Area Specific Standard**

   The use of discretionary direction for zones is appropriate as it enables a necessary level of flexibility.

   2degrees considers that the format and information requirements for a designation are appropriate, as these ensure that plan users can easily find out what a requiring authority can execute on a designated site.

   **S-IGP: Draft Introduction and General Provisions Standard**

   We support the requirement to set out details of which rules are more lenient or stringent than the NES in the National Direction Instruments Chapter, as this will provide clarity for plan users.

4. **Form Standards**

   **F-1: Electronic accessibility and Functionality Standard**

   Mobile and fixed line access via the rural broadband and ultra-fast fibre projects mean that electronic documents will soon be accessible just about anywhere in New Zealand.

   However, the majority of planning documents are not electronic. We consider the transitioning to electronic plans a critical step to improving access to relevant planning documents, improving time efficiencies during the planning process and significantly reducing administrative costs.
**F-2: Mapping Standard, F-3 and F-4: Spatial Planning Tools (District) Standard**

The requirement to have printed maps should be discretionary. An electronic plan provides the ability to print plans relevant to a particular project if necessary.

We support the development of a black and white palette of symbols and abbreviations, as this recognises the cost of printing colour and associated environmental issues. Moreover, the colour palette, especially when printed, is not always easy to read without symbols.

**F-5: Chapter Form Standard & F-6: Status of Rules and Other Text and Numbering Form Standard.**

We support the use of the standard template format in F5 and F6, which supports nationally consistent, easy-to-understand plans.

5. **Content and Metric Standards**

**CM-1: Definitions standard**

2degrees considers that “operational need” should also be included as a defined term, given that this term is currently in use in the Auckland Unitary Plan and Christchurch District Plans. Those plans provide the following definition, which should be incorporated in the Planning Standards:

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

2degrees is concerned that the definition of “height”, is open to interpretation and may result in confusion.

In addition, the definition concerning the method by which height is measured is in direct conflict with NESTF, Regulation 7(6). 2degrees is of the view that this conflict should be recognised and resolved by incorporating the NESTF height measurement regulations.

6. **Future Content for Draft National Planning Standards and Additional National Planning Standards**

We support the development of future content and additional planning standards, such as the draft National Planning Standard for Network Utilities (NPSNU) that is currently being developed. Network utilities are core infrastructure, relied on by all New Zealanders. As such, the regulatory framework that applies to this infrastructure needs to be consistent, yet retain flexibility in areas where variation is appropriate. For example, it is appropriate to retain a flexible approach in relation to how telecommunications facilities or mobile sites are permitted in areas of outstanding national landscape.

The NPSNU will go a long way in addressing the issues we have identified in the current planning environment, and we encourage the Planning Standards Team to consider where the NPSNU could be used to replace the utility and network provision chapters in district
plans. Currently, attempts to integrate the NESTF 2016 into district plan rules can result in complications for utility operators who are not also telecommunications operators.

Thank you for the opportunity to submit on this review. Please let me know if you have any questions.

Yours sincerely

Ben Blakemore
RAN Acquisition Manager