IN THE MATTER of the Resource Management Act 1991

**AND** 

IN THE MATTER Proposed Te Tai o Poutini Plan

**Hearing – Subdivision** 

JOINT STATEMENT OF EVIDENCE OF

GRAEME MCCARRISON FOR

SPARK TRADING NEW ZEALAND LTD

**AND** 

ANDREW KANTOR FOR CHORUS NEW ZEALAND LTD

**AND** 

**COLIN CLUNE FOR** 

ONE NZ GROUP LTD (FORMERLY VODAFONE NEW ZEALAND LTD)

AND

**FORTYSOUTH** 

15 MARCH 2024

## 1. INTRODUCTION

1.1 We presented corporate evidence and details of our experience and qualifications for the Energy, Infrastructure and Transport Hearing topic. That evidence can be referred to if required.

### **Graeme McCarrison**

1.2 My full name is Graeme Ian McCarrison. I am the Engagement & Planning Manager at Spark New Zealand Trading Limited ("Spark"), a position I have held since February 2015. I am authorised to give this evidence on Spark's behalf.

## **Colin Clune**

1.3 My full name is Colin William Clune. I am the Resource Management Planning Advisor at One NZ New Zealand Limited (One NZ). A position I have held since October 2014. Previously, I was an in-house contractor for One NZ, (September 2010 to September 2014), where I advised One NZ on resource management and government matters. I am authorised to give this evidence on One NZ's behalf.

#### **Andrew Kantor**

1.4 My full name is Andrew Robert Kantor. I am Environmental Planning and Engagement Manager at Chorus, where I been employed since 2015. I am authorised to give this evidence on Chorus' behalf.

## Scope of evidence

1.5 This statement of evidence is solely on the Subdivision provisions of the Proposed Te Tai Poutini Plan.

# 2. SUBDIVISION TELECOMMUNICATIONS SERVICES

- 2.1 As outlined in evidence for the Energy, Infrastructure and Transport Hearing, Spark, Chorus, One NZ and Forty South (the Telecommunications Companies) provide critical telecommunications infrastructure that is essential to modern society.
- 2.2 Having access to world class telecommunications services is critical to the way New Zealanders work, learn, live and play. This has been amplified by the ongoing changes in the way consumers use and access telecommunications networks, particularly in the wake of COVID-19, which accelerated trends in working and learning remotely.

- 2.3 The National Policy Statement on Urban Development (2020) (NPS-UD) includes recognition of "additional Infrastructure" in facilitating urban growth and fostering well-functioning urban environments. This includes telecommunications as defined under s5 Telecommunication Act, which covers fixed, wireless, and mobile networks.
- 2.4 While the Telecommunications Companies support the intent of SUB-S8 to ensure that telecommunications services are provided to all new allotments, we believe it is important for SUB-S8 to provide stronger direction to guarantee the provision of an appropriate level of service at the time of subdivision, alongside other essential services. Failing to provide adequate telecommunications infrastructure at the time of subdivision can lead to unnecessary disruptions and increased costs for end-users when installed retroactively. The Reporting Planner for the Subdivision Chapter has recommended rejection of our request for the level of service required to be specified within certain zones. We continue to seek the amendments outlined in our original submission to SUB-S8.
- 2.5 Without a clear directive to applicants of the level of service to be provided to each new allotment, owners of new lots may not have access to the telecommunication connectivity they expect. This has been our experience in other parts of the country, where the type of service has not been specified and telecommunications services have had to be retroactively installed in newly created roads, footpaths and berms to meet consumer demands and expectations. This concern is particularly pronounced in urban settings where there is an expectation for access to higher capacity networks.
- 2.6 If the level of service is not met, the activity status of the subdivision activity would change, and an applicant would have the opportunity to set out the reasons as to why the level of service is not necessary or appropriate for a proposed subdivision. The Telecommunications Companies believe this achieves an appropriate balance to ensure that all allotments created by any subdivision are adequately serviced by telecommunications in accordance with SUB-P2. We are more than happy to work with Council to establish a process to assess connectivity requirements.

GRAEME MCCARRISON, COLIN CLUNE, AND ANDREW KANTOR,
15 March 2024