

03 March 2017

District Plan Hearing Panel
Queenstown Lakes District Council
Private Bag 50072
QUEENSTOWN 9348

Dear Sir/Madam

Re: Queenstown Lakes Proposed District Plan - Chapter 2: Definitions

I am writing on behalf of Chorus New Zealand Limited (“Chorus”), Spark New Zealand Trading Limited (“Spark”) and Vodafone New Zealand Limited (“Vodafone”) with reference to the Section 42A Hearing Report dated 15 February 2017 (“Hearing Report”) for Chapter 2 of the Queenstown Lakes District Proposed District Plan.

Overall, Chorus, Spark and Vodafone are generally supportive of the recommendations that are found in the officer’s report. On this basis, the Chorus, Spark and Vodafone do not consider it necessary to present evidence at the hearing. However, there are three points with respect to the definitions that would benefit from amendment:

1. The definition of “Regionally Significant Infrastructure” includes “*Telecommunication and radio communication facilities, as defined by the Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2008*”. On 1 January 2017, an updated National Environmental Standard for telecommunications came into force. The definition would benefit by being updated to the current National Environmental Standard. The suggested amendment to the definition is shown below:

“Means:

- *renewable electricity generation facilities, where they supply the National Grid and local distribution network and are operated by an electricity operator; and*
- *electrical transmission infrastructure forming the National Grid*
- *electricity Distribution Lines identified on the Planning Maps; and*
- *telecommunication and radio communication facilities*; and*
- *key centralised Council infrastructure, including water reservoirs and wastewater treatment plants; and*
- *roads classified as being part of national or regional importance; and*
- *Queenstown and Wanaka airports*

* *As defined by the Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations ~~2008~~ 2016.”*

2. "Support Structure" is defined, and used in the Minor Upgrading rules and definition. However, it reads "Means a utility pole or tower that forms part of the electricity distribution or transmission network that supports conductors as part of a line. This includes ancillary equipment, such as communication equipment or transformers". It is also defined in Regulation 5(1)(v) of the National Environmental Standard for telecommunications as "in relation to a telecommunication line, any structure supporting the line". As the Minor Upgrading rules and definition also refer to telecommunication lines, which at times also use support structures, this definition should be broadened to include telecommunication lines. The suggested amendment to the definition is shown below:

"Means a utility pole or tower that forms part of the electricity distribution, or transmission network or telecommunication lines that supports conductors as part of a line. This includes any ancillary equipment, such as communication equipment or transformers."

3. There is a definition of "Small Cells", as was requested by Chorus, Spark and Vodafone. However, after the hearing on the Utilities chapter, the 2016 update to the National Environmental Standard for telecommunications came into force on 1 January 2017. This National Environmental Standard also defines "Small Cells". It is suggested that it is more appropriate to use the definition in the National Environmental Standard Telecommunication Facilities 2016 regulation 4 as follows:

~~*"Means a low-powered radio access node that provides improved cellular coverage or capacity and is operated by a telecommunications operator."*~~

means a device-

(a) that receives or transmits radiocommunication or telecommunication signals; and

(b) the volume of which (including any ancillary equipment, but not including any cabling) is not more than 0.11 m³"

Should the Hearing Panel or Council have any questions, the submitters would be happy to respond. Please contact the undersigned in the first instance.

Yours sincerely

Incite



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