



**Spark
New Zealand**

26th February 2016

Hearing Panel Commissioners

Queenstown Lakes District Council

Private Bag 50072

Queenstown 9348

dphearings@qldc.govt.nz

Dear Commissioners:

Queenstown Lakes Proposed District Plan – Strategic Directions S42A Report Response

Spark New Zealand Trading Limited, Chorus New Zealand Limited and Vodafone New Zealand Limited have joined together for the purpose of the Queenstown Lakes Proposed District Plan process in order to provide cohesive and efficient input from the telecommunications sector. The companies have lodged identical submissions.

Telecommunications (through fixed line and wireless services) are a basic and essential service in the same way as transportation, electricity, water and wastewater services. In today's society, people want to be connected anywhere, anytime, whether by a fixed line service, a mobile phone, or connecting devices to a "Wifi" network (i.e. a wireless local access network or "hotspot"). To ensure people stay connected, the various components of the fixed line mobile and wireless telecommunication networks need to be constructed, operated, maintained and upgraded. This work needs to be undertaken in an efficient and affordable way if it is to keep pace with demand. This, in turn, depends on a supportive and workable planning framework.

While the companies hold some concerns about the completeness and analysis in the section 42A report for the strategic directions chapter, the companies wish to record their support for the position recommended on Objective 3.2.1.7 (originally 3.2.1.5). The changes to this objective recognise the importance of being able to develop and upgrade telecommunication networks to meet the needs of both residents and visitors. We support the inclusive of new policy 3.2.1.7 related to regionally significant infrastructure.

The Lakes area is difficult to serve with effective telecommunications, due to the terrain and landscape sensitivity. Advanced telecommunications services are also demanded by residents, and particularly by international visitors, who have high expectations of connectivity, speed of networks and continuous coverage. The 'as notified' objective, with its recognition of only operating existing networks, is inadequate to respond to the demand for

new and improved services. Therefore it remains our opinion that there is a need for a more balanced approach to the strategic directions. In our submission we proposed that the following additional policies.

In recognition of the benefits of utilities and the significant investment in utilities, enable utilities and infrastructure to be developed, maintained, upgraded and operated provided that, as a result of its location, and design;

- a. *the adverse effects on significant natural and physical resources and cultural values are avoided, or where this is not practicable, remedied or mitigated; and*
- b. *other adverse effects on the environment are appropriately controlled.*
- c. *avoid land-uses that may result in adverse reverse sensitivity effects on telecommunication infrastructure facilities or where this is not practicable, remedied, mitigated.*

Enable infrastructure to be effective and efficient, especially in regard to its configuration, recognising that it may be located in or traverse sensitive areas where there is a functional or operational need for that location.

The telecommunications industry is in a unique position of comprising a group of businesses that operate networks on a national scale. The applications and services that these networks enable are essential for businesses, tourism and residential users who expect high speed, reliable services wherever they are and whatever they are doing. The majority of businesses within the district and New Zealand rely on telecommunications services (whether that be fixed or mobile, voice or data) for at least some part of their operation. It is vital that the district plan recognises the importance of telecommunications to the wider economy.

MBIE noted in a recent consultation document¹ that:

“Digital communications technologies are impacting almost every aspect of our lives. We rely on them for business, government, education, health and in our communities. The communications sector is a critical enabler of economic growth in the twenty-first century.”

Meeting consumer and business demands for new and improved digital services means constant investment and innovation and strong government support through nationwide policies. In 2014, total telecommunications investment reached \$1.7 billion. This level of investment, compared to revenue, put New Zealand near the top of the OECD in 2013. There has been a rapid deployment of competing 4G mobile networks with the deployment of 5G networks on the horizon. Further deployment into regional areas to provide broadband to rural communities via the Government’s Rural Broadband Initiative (RBI) continues and New Zealand has seen the fastest uptake of fibre in the developed world².

¹ Ministry of Business, Innovation & Employment Review of the Telecommunications Act 2001, Regulating Communications For The Future, September 2015

² TCF ‘Telecommunications – Enabling New Zealand’s Future’ prospectus 2016

Queenstown has benefited from the telecommunications sector's investment in terms of the technological change and the underlying opportunities for productivity gains. Rapid growth in demand for data services, driven in part by services such as video streaming, mean that further investment in telecommunications infrastructure will be necessary as the industry responds to this burgeoning demand.

It will be essential that further investment in telecommunications infrastructure can be made efficiently and with as much certainty as possible. The Queenstown Lakes Development Strategy February 2015 recognises that the District faces a number of challenges to improving its economic performance on it depends on having high quality infrastructure.

"All of this means that having high quality connections, via air, road and telecommunications infrastructure, is vitally important for the District."

The proposed amendments to the National Environmental Standard for Telecommunication Facilities (NESTF) will permit a significant amount of telecommunication activities. The NESTF has to be recognised as providing part of the solution in the Queenstown Lakes district. However there are other opportunities to be explored via the current district plan review if investment in our essential networks is match rapid for telecommunications.

The companies will not be lodging evidence for this hearing, but request that this letter is tabled with the hearing panel. We are available via a teleconference or videoconference to answer any questions that the hearing commissioners may have. Spark New Zealand Trading Limited, Chorus New Zealand Limited and Vodafone New Zealand Limited will be jointly provide planning and corporate evidence including on the importance of telecommunications to the Queenstown Lakes district at the upcoming hearings.

Yours sincerely,



Vodafone New Zealand Ltd
Colin Clune
Resource Management
Planner

Colin.Clune@Vodafone.co.nz

(09) 355 2000



Chorus New Zealand Ltd
Mary Barton
Environmental Planning
Manager

Mary.Barton@chorus.co.nz

027 702 8650



Spark New Zealand Trading Ltd
Graeme McCarrison
Engagement and Planning
Manager

graeme.mccarrison@spark.co.nz

027 4811 816 or 09 357 2807

