

**From:** [Plan Change 73](#)  
**To:** [graeme.mccarrison@spark.co.nz](mailto:graeme.mccarrison@spark.co.nz)  
**Cc:** [Submissions](#)  
**Subject:** Copy of your submission on Proposed Plan Change 73 PC73-0043  
**Date:** Monday, 3 May 2021 3:25:22 p.m.

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Submitter ID: PC73-0043

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#### Trade Competition Declaration

**I could gain an advantage in trade competition through this submission.**

No

**If yes: I am directly affected by an effect of the subject matter of the submission that**

**(a) adversely effects the environment; and**

**(b) does not relate to trade competition or the effects of trade competition.**

#### Hearing Options

**Do you wish to be heard in support of your submission?**

*If you choose yes, you can choose not to speak when the hearing date is advertised.*

Yes

**If others are making a similar submission would you consider presenting a joint case with them at the hearing?**

Yes

#### Point 1

Provisions to which my/our submission relates:

Spark is not opposed to proposed changes that have the potential for better density and land utilisation. The infrastructure assessment fails to provide for telecommunications adequate for the potential scale of development.

My position on this provisions is:

Support In Part

The reasons for my/our submission are:

Telecommunications is essential and critical infrastructure to a thriving local economy and social inclusion:

1. New Zealanders expect and demand access to digital services for the wide range of devices

they use. This includes such things as being able to make and receive voice calls, access websites, streaming services and working from home. There is a presumption that they will be able to access high speed data services via their mobile devices at home and on the move and have fast fibre or wireless broadband service at home.

2. Businesses and education providers need access to digital telecommunications services on cloud based software platforms for their payment solutions, taking orders from customers, accessing online accounting, online payroll systems, placing orders with their suppliers etc.

New developments are likely to make use of internet of things technology, using smart devices and remote probes which communicate in real time over telecoms networks for a range of applications including road management and environmental monitoring.

Telecommunications network operators (Network Operators), both wireless and fixed line, need to be involved in the conceptual design, planning and implementation of new developments to ensure that adequate infrastructure and capacity for the wireless and fibre networks is in place, based on the expected number of houses and businesses in the area.

For wireless and mobile network operators this means being able to work with developers to plan the locations needed for mobile equipment, such as cabinets, masts and associated facilities, acknowledging that this is more relevant to larger development proposals rather than smaller individual site developments.

It is far more efficient to identify the network requirements and opportunities during the planning and designed phase and install them during the initial build rather than trying to retrospectively add them later.

This will be particularly critical as mobile networks 5G deployments increase. In particularly dense areas 5G networks can utilise a large number of low powered sites to provide the best service. If we are involved in the initial planning, we can make sure these sites have the lowest possible visual impact on the new developments, and it will reduce the impact of the significant fibre backhaul deployment required.

**The decision I/we want Council to make:**

We request that the applicant be required to establish that the proposed development provides for both wireless and fixed line telecommunications networks. There has been no consultation with network operators regard to how wireless services will be integrated within the development to ensure customers have access to telecommunications services required to operate business, services and social needs.

## **Point 2**

**Provisions to which my/our submission relates:**

**My position on this provisions is:**

**The reasons for my/our submission are:**

**The decision I/we want Council to make:**

## **Point 3**

**Provisions to which my/our submission relates:**

**My position on this provisions is:**

**The reasons for my/our submission are:**

**The decision I/we want Council to make:**