DDPR_feedback_0150s		
	Name	Graeme McCarrison Colin Clune
	Organisation	Spark and Vodafone
	Email	Graeme.McCarrison@spark.co.nz; Colin.Clune@vodafone.com;
	Response Date	Aug 30 22
	Notes	
Q1	Select the chapter you want to provide feedback on	
	Subdivision	
Q2	In general, to what extent do you support the contents of this chapter?	
Q3	Objective/Policy/Rule/Standard reference:	
Q4	Feedback/Comments	
	The attached feedback from Spark and Vodafone is specific to the SUB-O2 and SUB-S6. We are keen to discuss the subdivision standards. Ngā mihi Graeme --- spark [cid:image001.png@01D8BC89.ADACBCF0] [cid:image002.png@01D8BC89.ADACBCF0] Graeme McCarrison	
Q5	Objective/Policy/Rule/Standard reference:	
Q6	Feedback/Comments	
Q7	Objective/Policy/Rule/Standard reference:	
Q8	Feedback/Comments	
Q9	Objective/Policy/Rule/Standard reference:	
Q10	Feedback/Comments	
Q11	supporting documents?	
	0	
Q12	If you need more space, or have any other general comments, please leave them here	
	Kia ora Spark, Vodafone and Chorus have provided combined feedback via Tom Anderson of Incite (Wellington). The attached feedback from Spark and Vodafone is specific to the SUB-O2 and SUB-S6. We are keen to discuss the subdivision standards. Ngā mihi Graeme --- spark [cid:image001.png@01D8BC89.ADACBCF0] [cid:image002.png@01D8BC89.ADACBCF0] Graeme McCarrison Planning & Engagement Manager Technology Spark New Zealand Trading Limited T +64 9 357 2807 M +64 9 274 811816 E Graeme.McCarrison@spark.co.nz Level 6, Mayoral Drive Building 31 Airedale Street Private Bag 92028, Auckland 1010 www.spark.co.nz	

31 August 2022

Waitaki District Council
Private Bag 50058
Oamaru 9444

By Email: planreview@waitaki.govt.nz

Dear Sir/Madam

Feedback on the Draft Waitaki District Plan Subdivision Section Standards

1. Spark, Vodafone and Chorus have provided combined feedback via Tom Anderson of Incite (Wellington). The following feedback is specific to the SUB-O2 and SUB-S6. We would happily discuss the changes sought, either via videoconference or a workshop, and we would be happy to collaborate with other infrastructure providers for this as well.

2. Spark and Vodafone consider that there is a need for clarification as to what qualifies as a telecommunication connection as required for example under SUB-R3, R6 & R7 and SUB-S6. It is our considered position that the proposed amendments in SUB-O2 and SUB-S6 will benefit the residents, visitors and businesses to Waitaki District.

3. Over the next 10 years how customers access telecommunication services are expected to be significantly different as telecommunication technology and service options evolve. Fibre connections in urban area are generally the common form of connectivity. It is worth noting that when outside users must rely on a wireless network for connectivity. The current wireless networks are rapidly evolving technology which includes:
    a. 5G networks in both rural and urban areas providing the opportunity for customers to have no dependency on fixed line service ie fibre
    b. 6G wireless technology
    c. Extensive satellite networks
    d. Fibre services upgraded to remain competitive with wireless

4. Mobile and wireless technology networks are essential as a backup in the event of natural disasters like earthquakes, floods, fires, and storm events. Integration with networks to manage connectivity to cars, vessels, airplanes and other IoT devices and Machine to Machine (M2M) connections on farms and remote worksites in remote and rural areas, assist with the delivery of enhanced mobile broadband and next-generation IoT devices by providing higher data rates and low latency across a constellation of satellites. The proposed subdivision requirements could be in place for 10 to 15 years depending on the implementation phases of the proposed Natural and Built Environments legislation.

5. The reasons for the amended telecommunication standards are as follows:
   a. Provide Waitaki District Council the confidence and proof that new allotments have the opportunity for digital connectivity to meet the requirements of the activities that will occur on the new property.
   b. Within the urban areas there will be fixed line fibre and wireless networks to connect new allotments.
   c. Outside urban areas there is the existing copper network as a last resort and wireless connections as the preferred option. Wireless connectivity for broadband services includes via a mobile cell-site operated by Spark, Vodafone, 2degrees or Rural Connectivity Group or a local network operator; satellite including via Farmside or Starlink.
   d. The wireless coverage footprint is expanding all the time consequently reducing the potential need for a new copper connection to serve a subdivision. Generally, the copper network is only extended where it is proven that there are no connection alternatives e.g. wireless. The requirement for a copper VDSL product is expected to deliver minimum download speeds to enable to users to utilise digital services e.g. video conferencing and streaming services.

6. There is a further amendment to SUB-S6 that for large subdivisions a requirement for the applicant to provide information as to the basis for their suggested provision for telecommunication services for inclusion in SUB-S6.4.5 is as follows:
   a. There is an assumption that wireless and mobile coverage and capacity will be available and not required to be provided by the developer. This is not always going to be the situation when the investment plans of the network operators have not yet provided coverage and capacity to service the new development. Consultation with the network operators will at least enable conversations that

will support network investment planning including capacity and coverage modelling. Potential benefit for the applicant/developer include:

b. Integration of wireless/mobile assets into the development potentially reducing the visual amenity impacts of infrastructure.

c. Marketing of the development with the knowledge that residents will have choice of telecommunication connectivity and service provider. The telecommunication network operators such as Spark, Vodafone and 2degrees are the only source of network information regarding the coverage, capacity and network design requirements to service a new development. Each network operator's requirements will be specific to the impact of the development on their network. This information is not publicly available.

PROVISION	**FEEDBACK**
SUB - Subdivision	
SUB-O2 Subdivision design Subdivision occurs in a sequenced and coherent manner and is designed so that it: 1. reflects and responds to: a) the physical characteristics and constraints of the site; and b) the character and amenity values of the surrounding area; and 2. is accessible and is connected to and integrated with existing communities and the transport network; and 3. consolidates urban development; and 4. promotes good quality urban design; and 5. maintains rural character in rural areas; and 6. avoids the sprawl of existing coastal settlements or creation of new coastal settlements; and 7. has an efficient layout and maintains public safety; and 8. provides for the health and well-being of communities; and 9. 9. provides accessible, usable and well-designed open space areas.	Support with amendment Digital connectivity is essential for everyone within the district, in the same way that connecting communities via roads are as highlighted in this policy. We propose an additional design consideration: 9. provides accessible, usable and well-designed open space areas*; and* *10. access to and the opportunity for digital/telecommunications connectivity for all people/communities within the district.*
SUB-S6 Electricity and telecommunications 1. All allotments must have provision for: a) telecommunication connections; and b) electricity connections. 2. where two or more allotments share an accessway, the telecommunication or electricity connection must be available from where the accessway joins the main body of each allotment.	Support with amendments for clarification as to what qualifies as a telecommunication connection. Amend to include SUB-S6.3 *3. SUB-S6.1.a) may be achieved by either:* *1. Provision for fibre optic cable connections to the legal boundary of the allotments for urban zones and for all non-urban zones the connection shall be to the approved building platform if there is one; or*

PROVISION	FEEDBACK
	2. *Provision with any subdivision consent application of written confirmation from a telecommunication network operator confirming that connection (mobile and wireless, which includes satellite, but where a wireless connection is not available copper VDSL is minimum connection standard) to a telecommunications network can be provided to all new allotments and describing how this can be achieved*. 4. *An application for subdivision of 100 allotments or more or 200 premises/dwellings shall provide a telecommunication needs assessment, from a recognised telecommunications network expert and/or the telecommunication network operators, of the capacity and additional requirements of the existing telecommunication services (fixed line, wireless and mobile) to provide telecommunication services to support the development potential of the subdivision. The outcome of the will be used to inform the need for land to be set aside for a wireless telecommunication facility SUB-S6.1.a).*

6. We also consider that as part of subdivision applications that the following information should be provided by an applicant.
    1. Applicant provides an actual assessment of what and how telecommunications will be provided to the subdivision (lots/development).
    2. Confirmation in writing from network operator/s how telecommunications will be provided to the subdivision. Noting this potentially could be via confirmation of
        a. Contract to construct fibre connection.
        b. Information that sets out the existing availability ie coverage and capacity of the existing mobile and wireless facility/ies to serve the subdivisions and developments with a 100plus allotments.
        c. Identification of any land required to enable telecommunications and electricity.

    Application assessment and consent including conditions for telecommunications connections

1. Reporting planner confirms with the network operator/s supporting the application that telecommunication proposal is correct.
2. Share for comment any draft telecommunication condition/s with the network operator/s.

Applicant information as part of the confirmation of the conditions related to Telecommunication connections:

1. Applicants provides confirmation from the network operator/s that the telecommunication connection requirements have been completed.

Yours sincerely,

Graeme McCarrison
Engagement & Planning Manager,
On behalf of Spark New Zealand Trading Limited
Graeme.McCarrison@spark.co.nz
Mob +64274811816

Colin Clune
RMA Planner, Networks & Platforms - Radio Access,
On behalf of Vodafone New Zealand Limited
Colin.Clune@vodafone.com
Mob +642102929905