

26 October 2022



Plan Change 20 Hearing Panel  
Mackenzie District Council  
PO Box 52  
Main Street  
Fairlie 7949

**By Email:** [c/-\\_districtplan@mackenzie.govt.nz](mailto:c/-_districtplan@mackenzie.govt.nz)

Dear Commissioners,

**Plan Change 20 to the Mackenzie District Plan**

Chorus New Zealand Limited, Spark New Zealand Trading Limited and Vodafone New Zealand Limited (collectively referred to in the s42A Report for Plan Change 20 as 'The Telcos'), provided a submission on Plan Change 20 to the Mackenzie District Plan.

The submission consisted of five submission points, all of which supported provisions as notified in Plan Change 20. The Section 42A Officer recommendations on these provisions have been reviewed, and The Telcos support of these provisions remains unchanged. Attachment 1 to this letter identifies the provisions of Plan Change 20 which The Telcos submitted on, the Officer Recommendations on those submission points, and, in accordance with Paragraph 17 of Minute 1 (Directions of the Hearing Panel), the reasoning as to why the Officer Recommendations are supported.

I have no further comment to make on Plan Change 20 and as such do not intend to appear at the hearing. However I am available to answer any queries or questions either in writing or via a videoconference that the Hearing Panel may have, should the Hearing Panel not agree with any recommendations made by the Council Officer.

Yours sincerely

**Incite**

Tom Anderson

**Director/Principal Planner**

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**Attachment 1: Analysis of The Telcos Submission Point and S42A Recommendations**

PROVISION SUBMITTED ON	SUBMISSION	S42A Recommendation	Telco Position and Reasoning Post S42A Recommendation
<b>Part 1: Chapters</b>			
<p><b>Chapter: National Environmental Standards</b></p> <p><i>National environmental standards (NESs) are prepared by central government and can prescribe technical standards, methods (including rules) and/or other requirements for environmental matters throughout the whole country or specific areas. If an activity doesn't comply with an NES, it is likely to require a resource consent. NESs must be observed and enforced by local authorities. The following NESs are currently in force:</i></p> <ul style="list-style-type: none"> <li>• <i>Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016</i></li> </ul>	Support	Retain as notified	No change to Plan Change 20 from what was notified, therefore support is continued.
<p><b>Chapter: Regulations</b></p> <p><i>The regulations included in this chapter come under the Resource Management</i></p>	Support	Retain as notified	No change to Plan Change 20 from what was notified, therefore support is continued.

<p>Act 1991 (excluding the national environmental standards listed above). These regulations are:</p> <ul style="list-style-type: none"> <li>• Resource Management (Network Utility Operations) Regulations 2016</li> </ul>			
<b>Part 2: District-Wide Matters Section: Strategic Direction</b>			
<p><b>ATC-03 Infrastructure</b></p> <p>The importance of infrastructure to the District and beyond is recognised and provided for.</p>	Support	Retain as notified	No change to Plan Change 20 from what was notified, therefore support is continued.
<p><b>ATC-05 Adaptation and resilience</b></p> <p>The approach to managing resources allows the community to be resilient and adapt appropriately to change, including the effects of climate change.</p>	Support	<p>Amend as follows:</p> <p><i>The approach to managing <u>natural hazard risks and the effects of climate change</u> resources is <u>integrated and allows the community to be resilient and adapt appropriately to change.</u></i></p>	Changes are relevant to adaptation and resilience and therefore the Telcos position of support remains in place.
<p><b>UFD-01 Urban Form and Development</b></p> <p>The District's townships and settlements grow and develop in a consolidated way that:</p> <p>1. is integrated into, and respects the values of the surrounding natural and physical environment;</p>	Support	<p>Amend as follows:</p> <p><i>The District's townships and settlements grow and develop in a consolidated way that:</i></p> <p>1. <i>is integrated into, and respects the values of the surrounding natural and physical environment;</i></p> <p>2. <i>achieves good connectivity with other</i></p>	Replacing <i>supported by</i> with <i>integrated with the provision</i> provides more directive wording and strengthens the link necessary link between growth and infrastructure. As such, the amendment recommended by the officer is supported.

<p>2. achieves good connectivity with other parts of the urban area;</p> <p>3. is supported by appropriate infrastructure;</p> <p>4. maintains the character of each township, and its attractiveness to residents, businesses and visitors; and</p> <p>5. responds to the needs of the community, including diversity in housing and business opportunities.</p>		<p>parts of the urban area;</p> <p>3. <del>is supported by</del> <u>integrated with the provision of</u> appropriate infrastructure <u>and facilities which support the functioning of the community;</u></p> <p>4. maintains the <u>anticipated</u> character of each township, and its attractiveness to residents, businesses and visitors; and</p> <p>5. responds to the needs of the community, including diversity in housing and business opportunities.</p>	
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