

8 September 2022

Mackenzie District Council
PO Box 52
Main Street
Fairlie 7949

Dear Sir/Madam

Submission: Plan Change 20

This submission on Plan Change 20 to the Operative Mackenzie District Plan is on behalf of Chorus New Zealand Limited, Spark New Zealand Trading Limited and Vodafone New Zealand Limited, all being telecommunication service providers and network utility operators in New Zealand. All three companies are also and recognised as Requiring Authorities by the Ministry for the Environment under the Resource Management Act 1991.

Telecommunications infrastructure is significant and essential, and the safe, reliable and efficient functioning of telecommunication networks is vital for the national, regional and local economy and is in the public interest both in terms of allowing people and communities to provide for their "wellbeing", and also for assisting to ensure their "health and safety".

Recognising such infrastructure in the Strategic Directions section of a District Plan is considered to be appropriate, and the manner in which Plan Change 20 seeks to introduce such measures is supported.

Submission points on Plan Change 20 are attached to this letter. We would happily discuss the submission points, either via videoconference or a workshop, and we would be happy to collaborate with other infrastructure providers for this as well.

Yours sincerely,



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Submissions on Plan Change 20 (Strategic Chapters) to the Operative Mackenzie District Plan – September 2022

| PROVISION | SUBMISSION |
|--|------------|
| Part 1: Chapters | |
| <p>Chapter: National Environmental Standards</p> <p>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:</p> <ul style="list-style-type: none"> • Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016 | Support |
| <p>Chapter: Regulations</p> <p>The regulations included in this chapter come under the Resource Management Act 1991 (excluding the national environmental standards listed above). These regulations are:</p> <ul style="list-style-type: none"> • Resource Management (Network Utility Operations) Regulations 2016 | Support |
| Part 2: District-Wide Matters | |
| Section: Strategic Direction | |
| <p>ATC-03 Infrastructure</p> <p>The importance of infrastructure to the District and beyond is recognised and provided for.</p> | Support |
| <p>ATC-05 Adaptation and resilience</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>UFD-01 Urban Form and Development</p> <p>The District's townships and settlements grow and develop in a consolidated way that:</p> <ol style="list-style-type: none"> 1. is integrated into, and respects the values of the surrounding natural and physical environment; 2. achieves good connectivity with other parts of the urban area; 3. is supported by appropriate infrastructure; 4. maintains the character of each township, and its attractiveness to residents, businesses and visitors; and 5. responds to the needs of the community, including diversity in housing and business opportunities. | Support |