

**IN THE MATTER of the Resource
Management Act 1991**

AND

**IN THE MATTER of Porirua City Council's
Proposed District Plan**

Hearing Stream 5 – Subdivisions – SUB-S7

**ADDITIONAL INFORMATION IN RESPONSE TO QUESTIONS FROM THE
HEARING COMMISSIONERS**

GRAEME IAN MCCARRISON FOR

SPARK TRADING NEW ZEALAND LTD

**IN RELATION TO HEARING STREAM 5 OF PORIRUA CITY COUNCIL'S
PROPOSED DISTRICT PLAN**

30 MAY 2022

1. ADDITIONAL INFORMATION IN RESPONSE

1.1 In response to Panels questions posed during hearing 5 on Wednesday 25th May and set out in PCC Minute 37 on Pages 3 and 4 I am able to provide suggestions for amended wording to rule SUB-S7.

1.2 Question 1 related to the provision of a suggested minimum standard of service for telecommunication connections in non-urban areas. I have discussed the suggested standard with Chorus as the suggestion relates to the Chorus copper network. The suggested standard for inclusion in SUB-S7.2 is:

2. All new allotments must have provision for connection to telecommunication infrastructure.

This may be achieved by either:

- a. Provision for fibre optic cable connections to the legal boundary of the allotments; or
- b. 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.

1.3 As background to the reasoning for the suggestion standard will achieve a telecommunication connection performance anticipated:

- a. A copper connection is only permitted in the few locations where a wireless connection for broadband cannot be achieved. Wireless connectivity for broadband service 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.
- b. The wireless coverage footprint is expanding all the time consequently reducing the potential need for a new copper connection to serve a subdivision.
- c. Generally, the copper network is only extended where it is proven that there are no connection alternatives e.g. wireless.
- d. Would not enable a copper connection that is equivalent to “dial speed broadband.
- e. The 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.

- 1.4 The second question was to clarify the information requirement to ensure that applicants provide information as to the basis for their suggested provision for telecommunication services for inclusion in SUB-S7.5 is as follows:

The applicant 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 as provided in requirement SUB-S7.4

- 1.5 As background to the reasoning for the suggestion are as follows:

- a. 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.
- b. There are telecommunication experts that potentially could be engaged by an applicant to put together an expert assessment based on information obtained each network operator on network coverage, capacity and network design requirements to service a new development. Hence the reason for providing the option for council to receive an assessment from a recognised telecommunications network expert.
- c. Seeking information for the telecommunication network operators is similar to approaching Wellington Water or PowerCo or Wellington Electricity.

- 1.6 I am available to answer any questions that my arise from the above suggestions.

GRAEME MCCARRISON

30 May 2022