



28 October 2025

PROPOSED FAR NORTH DISTRICT PLAN: HEARING TOPIC 16 SUBDIVISION

Graeme McCarrison - Summary Statement Spark/One NZ S517

1. Spark is New Zealand's largest telecommunications company and provider. Chorus (Submitter 278) and Spark and Vodafone New Zealand Limited (now One NZ) (Joint Submitter 517) lodged separate submissions regarding the subdivision chapter. Since lodging the submission Spark, One NZ, and Chorus have agreed a position on the requirements for telecommunications connections under SUB-S6.
2. Spark, One NZ, with our tower delivery companies Fortysouth and Connexa invest significantly every year in our networks to ensure New Zealanders have access to essential and world class digital services. New Zealanders and businesses expect and depend on access to these networks, as set out in the joint evidence presented in Hearing 11 updated details in this evidence.
3. New Zealanders and businesses expect properties and premises to have access/connection to a telecommunications network (fixed line and wireless) of their choice. As communities grow and urban environments intensify, reliable connectivity becomes essential for well-functioning development.
4. Both private and public infrastructure serve essential public functions and are supported by enabling frameworks and standards. Communities rightly expect to have access to electricity, telecommunications, water services and transport networks - regardless of ownership – given their critical role in supporting everyday life and economic activity. Telecommunication connections, like other essential utilities, should be included as a standard requirement for subdivisions.
5. The Far North District Council's digital strategy, "Nothing But Net," promotes improved connectivity which stands in contrast to the reporting planner's recommendation on SUB—S6 to remove the requirement to provide

telecommunications connectivity. The Digital Strategy's vision of universal connectivity and digital equity relies on robust infrastructure being available to every household, regardless of location. By requiring telecommunications connections as part of subdivision development, Council would be directly implementing the strategy's goals—ensuring that new developments contribute to closing the digital divide and enabling access to essential services, education, and economic opportunities for all residents.

6. The decision to remove the requirement for telecommunications connections for new lots, as originally notified in the proposed district plan, has been made without consultation with telecommunications network providers. This is concerning, given the importance of connectivity in modern developments. The responsibility for confirming the availability of telecommunications services at the time of subdivision lies with the developer, and engaging network operators to confirm this in writing is a reasonable and practical step. It is likely that future property owners or tenants who are unable to connect to a telecommunications network will turn to Council for resolution, rather than the developer. This outcome would effectively shift the burden of connectivity issues onto Council.
7. Far North and the rest New Zealand depends on the construction and provision of resilient telecommunication networks. Telecommunications networks, along with the other critical networks such as electricity have proven to be resilient. It is critical that the network operators have information about new large developments in order to achieve the direction provided under the NPS-UD.
8. Spark as critical infrastructure stakeholder has been involved and engaged during:
 - a. the long process to develop the proposed district plan including multiple workshops on telecommunications in the Far North.
 - b. supporting the development of the Far North Digital Strategy.
 - c. most recently (2024-2025) the Te Pātukurea - Spatial Plan for Kerikeri–Waipapa.
 - d. Resource consent applications and certificates of compliance for new telecommunications network.

9. It is regrettable that telecommunications infrastructure is not being given the same consideration as other essential networks, such as electricity or the public networks, despite its critical role in supporting connected communities.