

From: [Sunit Patel](#)
To: [RPS](#)
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Subject: PORPS Further Submission - Chorus, Spark and Vodafone
Date: Thursday, 11 November 2021 9:15:59 p.m.
Attachments: [Outlook-Incite log.png](#)
[F-Sub ORC - Telcos.pdf](#)

To whom it may concern,

Please find attached further submissions by Chorus, Spark and Vodafone on submissions by the following parties to the Proposed Otago Regional Policy Statement.

Meridian Energy Limited
Aurora Energy Limited
New Zealand Infrastructure Commission
Transpower New Zealand Limited
PowerNet Ltd
Otago Water Resource Users Group

By way of service, these further submissions are also provided to these parties.

If you can confirm receipt of this email, that would be much appreciated.

Kind regards,

Sunit Patel
Resource Management Consultant



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Form 6

CLAUSE 8 OF FIRST SCHEDULE, RESOURCE MANAGEMENT ACT 1991

FURTHER SUBMISSION IN SUPPORT OF OR IN OPPOSITION TO SUBMISSIONS ON PUBLICLY
NOTIFIED PROPOSED OTAGO REGIONAL POLICY STATEMENT

To: Otago Regional Council
Level 2
144 Rattray Street
Dunedin 9016

Attention: Proposed Otago Regional Policy Statement Submission

Name of submitter: Chorus New Zealand Limited
P O Box 632
Wellington

Spark New Zealand Trading Limited
Private Bag 92028
Auckland 1010

Vodafone New Zealand Limited
Private Bag 92161
Auckland 1142

This is a further submission on the following proposed plan, change or variation: **Proposed Otago Regional Policy Statement (Proposed PRS).**

1. Chorus New Zealand Limited (Chorus), Spark New Zealand Trading Limited (Spark) and Vodafone New Zealand Limited (Vodafone) have lodged joint further submissions to the Proposed RPS.
2. Chorus, Spark and Vodafone are each a person who has an interest in the Proposed RPS that is greater than the interest of the general public. This is because Chorus, Spark and Vodafone have particular interests in ensuring that the Proposed RPS enables the continued and efficient operation and development of their regionally significant network utility infrastructure
3. Chorus, Spark and Vodafone therefore make the following further submissions as set out in the table attached to this form.
4. Chorus, Spark and Vodafone will not gain an advantage in trade competition through these further submissions.

Chorus, Spark and Vodafone wish to be heard in support of their further submissions. If others make a similar submission, Spark will consider presenting a joint case with them at a hearing.



Signed:

On behalf of Chorus New Zealand Limited



Signed:

On behalf of Spark New Zealand Trading Limited



Signed:

On behalf of Vodafone New Zealand Limited

Dated at Auckland this 12th day of November 2021.

Address for Service:

Chorus New Zealand Limited, Spark New Zealand Trading Limited and Vodafone New Zealand Limited
C/- Incite
P O Box 3082
Auckland 1140

Contact Details:

Attention: Chris Horne
Telephone: 027 4794 980
E-mail: chris@incite.co.nz

Copies to:

Andrew.kantor@chorus.co.nz

Graeme.mccarrisom@spark.co.nz

Colin.clune@vodafone.com

Submitter Name	Submitter + Submission point number	Specific Provision	Support OR Oppose	Reason for support/opposition	I seek that the whole (or part) of the submission be allowed (or disallowed):
Meridian Energy Limited	00306.012	New definition – Upgrade	Support	This submission is supported as currently there is no Proposed RPS definition for upgrade. This submission provides clarity as to what would constitute an upgrade and can relate to telecommunications infrastructure.	Seek that the whole of the submission be allowed.
Aurora Energy Limited	00315.035	ECO – P3	Support	This submission is supported as the amendment ensures provisions in the ECO chapter do not negate the framework provided for in the EIT-INF chapter in relation to sensitive areas.	Seek that the whole of the submission be allowed.
New Zealand Infrastructure Commission	00321.100	General	Support	The submission is supported as it seeks to place more emphasis on the benefits of infrastructure to society and the environment.	Seek that the whole of the submission be allowed.
New Zealand Infrastructure Commission	00321.104	General	Support	The submission is supported as it seeks to enable infrastructure provision in outstanding natural areas.	Seek that the whole of the submission be allowed.
New Zealand Infrastructure Commission	00321.105	General	Support	The submission is supported as it recognises that infrastructure provides an essential contribution to societal wellbeing however the provision of such should still be appropriately balance with regard to effects on heritage values.	Seek that the whole of the submission be allowed.
Transpower New Zealand Limited	00314.001	EIT – INF – General	Support	The submission is supported as it allows for great clarity with regard to the approaches and outcomes for nationally significant infrastructure and regionally significant infrastructure.	Seek that the whole of the submission be allowed.
PowerNet Ltd	00511.032	EIT– INF – General	Support	The submission is supported as it recognises that network utility infrastructure should not be precluded in certain situations given such infrastructure is critical to the health and wellbeing and prosperity of New Zealanders.	Seek that the whole of the submission be allowed.
New Zealand Infrastructure Commission	00321.058	EIT – INF – P14	Support	The submission is supported as it recognises that a reduction in existing adverse effects may not always be reasonably necessary for substantial infrastructure upgrades depending on the nature of the facility and location.	Seek that the whole of the submission be allowed.
OWRUG	00235.142	NFL – P3	Support	The submission is supported as it provides a clear direction as to the application of EIT-INF-P13 rather than NFL-P3 in relation to adverse effects on highly valued natural features and landscapes.	Seek that part of the submissions be allowed insofar that it recognises the policy approach of EIT-INF-P13 must be applied where considering policy NFL-P3.