

# PROPOSED WAIMAKARIRI DISTRICT PLAN: NFL TOPIC

## Chris Horne Speaking Notes

1. The Telecommunications Companies have one outstanding submission point on this topic addressed in my evidence which seeks to ensure that the policy framework in the NFL chapter does not inadvertently negate the intended management framework for network utilities in sensitive natural environments set out in Policy EI-P5 of the Energy and Infrastructure (EI) Chapter. Two requested amendments to NFL standards are supported in the s42A report.
2. As outlined in my evidence for Hearing Stream 1 and 2, under the *Resource Management (National Environmental Standards for Telecommunications Facilities) Regulations 2016* (NESTF), any relevant rules and objectives and policies in the certain sensitive environments such as those covered in the NFL Chapter will continue to apply to telecommunications equipment covered by those regulations. Accordingly, a workable policy framework for telecommunications infrastructure in these areas is particularly important.
3. The s42A report outlines how the policy provisions of the EI Chapter will be read together with those of the NFL chapter to determine in any particular circumstance whether a proposal is appropriate in the circumstances. Whilst I agree with this approach in principle, I set out in my evidence how I have concerns that the particular wording of certain NFL provisions may override the intended management framework of EI-P5 for network utilities in sensitive natural environments. Submissions from other parties, namely Transpower, Mainpower and Waka Kotahi, raise similar concerns.
4. A memo filed by Andrew MacLennan who is the reporting planner for the EI Chapter reinforces that the policy provisions in the EI and NFL Chapters will both be relevant in assessing any particular infrastructure proposals. He reiterates that clauses (3) and (4) of EI-P5 are intended to provide an alternative pathway for managing the effects of regionally significant infrastructure outside of the Coastal Environment.
5. I support the amendments sought by the Telecommunications Companies to NFL-P1, P3 and P4 (or changes of like effect) to reinforce that the alternative pathway for considering network utilities in areas covered by these policies applies to ensure a strict avoidance approach is not applied.