



TCF submission to the Environment Committee on the Fast-track Approvals Amendment Bill

17 November 2025

Introduction

1. Thank you for the opportunity to make a submission on the Fast-track Approvals Amendment Bill. This submission is made on behalf of the New Zealand Telecommunications Forum (TCF). The TCF is the telecommunications sector's industry body which plays a vital role in bringing together the telecommunications industry and key stakeholders to resolve regulatory, technical and policy issues for the benefit of the sector and consumers. TCF member companies represent 95 percent of New Zealand telecommunications customers. Our members include network operators, tower companies and retail service providers.
2. The telecommunications sector provides critical infrastructure and services (such as internet access, messaging and voice calling) that communities, businesses and government rely on to be able to communicate, access essential services and do business. Telecommunications is also an enabler for other areas of critical infrastructure, including housing.
3. The TCF supports the principle of a fast track mechanism, and the Government's commitment to help accelerate infrastructure and development projects that deliver significant regional and national economic benefits. We also understand that the Government wants these projects to be delivered efficiently and effectively. This cannot happen if connected infrastructure (required for the delivery of a project or affected by it) is not consulted and able to prepare. We therefore propose changes to clause 6 concerning parties who must be consulted or notified in writing, and clause 33 concerning a panel's discretion to invite comments.

Our concerns about reduced consultation requirements and commenting opportunities

4. Large-scale infrastructure and development proposals enabled under the fast track process require supporting infrastructure, such as telecommunications.

5. The TCF is concerned that the proposed amendments to the fast track process - narrowing the scope of who should be consulted, limiting who must be notified, and who a panel can invite to comment on a fast track proposal - will inhibit the ability of our sector to provide essential telecommunications infrastructure and services to major housing developments and along new roads.
6. The implications of telecommunications not being consulted are as follows:
 - a. Delayed or sub-optimal telecommunications coverage: if network operators and tower companies don't know a large housing development or new road is coming, they can't plan for it. If telco infrastructure, such as underground fibre optic cables or cell towers need to be installed after the fact this will increase costs significantly, make it much more difficult to find suitable sites and cause significant disruption to residents or road users. There are also safety issues for road users if roads are constructed without having connectivity built in.
 - b. Needing to relocate telecommunications infrastructure: engagement between developers and network operators and tower companies ahead of time can avoid the risk of existing telecommunications infrastructure needing to be moved. This comes at significant cost with delays as suitable new sites are found, and can degrade coverage.
7. It was disappointing that the initial Fast Track Approvals Bill was passed without taking into account the interconnectedness of critical infrastructure. The proposed amendments to the consultation and commenting opportunities will exacerbate the problem. Not considering relevant infrastructure networks as part of the fast track process puts fast track projects at risk of delay while infrastructure providers negotiate locations for their infrastructure and seek appropriate consents. If this is not addressed then fast tracked projects (including much needed housing developments and new roads) could be without essential utilities such as internet access and mobile calling.

Proposed amendments

8. We propose changes to the provisions of the Bill concerning consultation requirements and a panel's ability to invite comments, as follows:
 - a. In clause 6, amending section 11 (*consultation requirements for referral application*), **"relevant infrastructure network providers" should be added to the list of consulted parties in sub-section (1)(a)**, either where that infrastructure is required for the delivery of the project, or the project otherwise may impact that infrastructure. If this is not done, **"relevant infrastructure network providers" should be added to the list of parties in (1)(b) that must be notified in writing.**
 - b. Clause 33, amending section 53 (*panel invites comments on substantive application*), should be amended to **enable panels to invite infrastructure network providers to comment on an application where that infrastructure is required for the delivery of the project, or the project otherwise may impact that infrastructure.** Local authorities do not have the necessary expertise on telecommunications

infrastructure and in our experience often do not consider the need for telecommunications when approving developments. This means it will not be sufficient to rely on comments from local authorities. We also note that having discretion to invite feedback from infrastructure network providers will be essential if the panel is to have enough information to impose a condition that the infrastructure in the project area is or will be made adequate, as proposed in clause 46.

New provision on conditions relating to infrastructure

9. The TCF supports the intent of proposed new section 84A (in clause 46) which would enable a panel to set conditions to ensure that the infrastructure in the project area or other infrastructure the project will rely on is or will be made adequate to support the project.
10. It is unclear how this would work in practice when the relevant infrastructure, such as telecommunications, is owned by a third party. For telecommunications something akin to a Network Utilities Management Plan (NUMP) condition would be a good start. NUMPs provide a framework for protecting, relocating and working in proximity to existing network utilities.
11. If there are any questions about this submission, please contact Kim Connolly-Stone (kim.connolly-stone@tcf.org.nz) in the first instance.