



**TCF Submission on Going for Housing Growth (pillar one): providing for urban  
development in the new resource management system  
August 2025**

**Introduction**

1. Thank you for the opportunity to make a submission on the [Going for Housing Growth](#) discussion paper. This submission is provided by 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, the companies that build and operate cell towers, and retail service providers. Some members will be making their own submissions as well.
2. Telecommunications network operators and tower companies engage with the resource management system to maintain, upgrade and build mobile/wireless facilities, install fibre optic cables overhead and underground, lay national and international submarine cables, and build and maintain exchange facilities with backup power supply (battery, solar and wind) for resilience purposes and to serve more remote locations.
3. The sector invests significantly (approximately \$1.6 billion per year<sup>1</sup>) in its networks to ensure New Zealanders have access to world class digital services. Resource management processes can delay deployment in underserved areas, hold back service innovation, and impact ability to meet strict regulatory or contractual timeframes for government supported rollouts.

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[https://comcom.govt.nz/\\_data/assets/pdf\\_file/0033/361959/2023-Telecommunications-Monitoring-Report-15-August-2024.pdf](https://comcom.govt.nz/_data/assets/pdf_file/0033/361959/2023-Telecommunications-Monitoring-Report-15-August-2024.pdf)

4. In this submission we share some context on telecommunications and housing growth, then comment on the following issues:
  - a. minimum building heights in the intensification proposals
  - b. spatial planning
  - c. the need for better coordination of infrastructure provision with housing intensification.

### **Telecommunications and housing growth**

5. People living in houses need to be able to access utilities, including telecommunications services. Without these services communities would not be liveable. Any changes to the resource management system to enable more urban development and housing need to require the provision of supporting infrastructure, such as telecommunications.
6. Ensuring new housing developments have access to telecommunications services is already challenging under the existing regime. Developments are approved without thinking about the need for and impact on related infrastructure services such as telecommunications. There are two issues here: the impact on existing infrastructure (for example, if it needs to be moved or modified) and the need for additional infrastructure to support the new development.
7. Often telecommunications infrastructure needs to be added after a development is complete, which is more difficult, expensive and disruptive to residents. For example, new roads and berms need to be dug up to lay fibre, and cell sites need to be constructed in front of new homes. Additional planning processes, costs and time delays will apply. This also introduces additional complexities that can prevent funding for new telecommunications infrastructure from being equitably distributed across the development.
8. Medium and high density developments, with taller buildings closer to each other, present additional challenges. Enabling connectivity in these environments requires a combination of taller towers and antennas on buildings. Residential buildings are rarely structurally designed to have heavy mobile telecommunication network equipment attached to the roof and/or exterior walls. Currently under the National Environmental Standards for Telecommunication Facilities there is no requirement for developers to design or provide access for network operators equipment.
9. The complexity and cost often means that new infrastructure will not be installed (or will be delayed) and residents will have less choice and less reliable internet access or mobile calling.

## **Intensification proposals (minimum building heights)**

10. The discussion paper seeks feedback on whether the requirement to enable at least six storeys in specific areas should be increased (for example, to eight or ten storeys) to make more medium-to-high density developments feasible in intensification areas. There is also a question about the costs and risk of requiring councils to enable more than six storeys.
11. While the TCF is neutral on the proposal to increase building heights, we consider it essential that telecommunications standards are reviewed and amended in parallel to ensure adequate network coverage and service quality across intensified areas.
12. As noted earlier in this submission, taller and more densely located buildings make it more difficult to provide connectivity. While the National Environmental Standards for Telecommunications Facilities (NESTF) is being updated as part of phase two of the resource management reforms, the proposed height increases and other changes proposed through these amendments will not be sufficient if councils are required to enable more than six storeys.
13. Despite the reliance of telecommunications in people's daily lives and during natural hazard events, the industry is still experiencing apprehension from some councils where compliance with the NESTF is not achieved and resource consent is required. This corresponds to costly delays in delivering fast and reliable telecommunication services to communities. Ultimately where an acceptable solution cannot be reached there is a risk that a new housing development is left without the same level of connectivity as other areas.
14. Most district plans contain provisions within subdivision rules that require developers to provide telecommunication connectivity. However, our experience is that these provisions often lack sufficient detail, resulting in inadequate connectivity outcomes in new developments.
15. To avoid these risks, the following needs to happen:
  - a. Any changes to the National Policy Statement on Urban Development (NPS-UD) need to be aligned with decisions on amendments to the NESTF.
  - b. Developers planning intensive urban development, and local government, will need to coordinate with network operators (both fixed line and wireless) on how and where telecommunications infrastructure will be located, and to ensure there are connectivity options to meet customer demand.
  - c. Where existing telecommunications infrastructure exists and intensification is proposed there needs to be a trigger to ensure that providers are made aware of any changes in height that may compromise existing coverage or

inadvertently result in changes to radio frequency exposure. Advanced notice will ensure that providers have sufficient lead in time to respond to the changing urban environment. Where a new site or a change to an existing site is required an enabling regulatory framework is necessary to ensure continuity of service. The industry is actively engaging with local government and developers to raise awareness, but asks that this be supported through triggers either in the NPS-UD itself or alternatively through supporting guidance material.

### **Future development strategies and spatial planning**

16. The discussion paper asks (in question two) how spatial planning requirements should be designed to promote good housing and urban outcomes in the new resource management system.
17. Spatial planning is an essential tool for the telecommunications industry as it provides information on where growth is expected, which enables the sector to do network planning. However, existing spatial plans which are non-statutory fail to recognise telecommunications as infrastructure needed to support a well-functioning urban environment, growth, housing and business development.
18. The Future Development Strategies and Implementation Plans under the NPS-UD are useful but generally fail to recognise small footprint but critical infrastructure such as telecommunications and electricity distribution networks.
19. What we need is:
  - a. A mechanism for privately owned infrastructure providers to input into the spatial planning process.
  - b. The inclusion of both large and small footprint infrastructure. While large footprint critical infrastructure is easier to visually identify, in our increasingly digital world all spatial plans and combined plans can be developed and presented digitally. This should enable, subject to commercial confidentiality, all networks to be shown whether large or small footprint.
  - c. For infrastructure to be represented spatially and in words describing the need for and critical nature of telecommunications and other networks, to support housing.
  - d. Investment in data about the natural environment and hazards to support spatial planning. This will provide a solid foundation for making informed decisions and managing risks effectively.

- e. Inclusion of infrastructure corridors in spatial plans, as integrated spaces for multiple networks. Roads are infrastructure corridors, not solely places for transport. It should be assumed that wherever a road is shown on a spatial plan it is an infrastructure corridor that will also accommodate telecommunications and electricity.
- f. A national spatial plan (or similar) that sits over or informs regional spatial plans.

## **Recommendations to better integrate supporting infrastructure with housing development**

### *Coordinating infrastructure provision with land-use planning*

- 20. As noted earlier in this submission, there is often no requirement for developers, or councils approving housing developments, to engage with telecommunications providers before a development is built. This becomes even more important in medium and high density developments where it is more difficult to provide connectivity.
- 21. Telecommunications needs to be designed into and provided for in brown and greenfield developments, not an afterthought. Development contributions need to be made towards the costs.
- 22. We propose that RM Bill 3 include a provision requiring councils and developers using housing intensification planning instruments (and more generally) to ensure that people living in new housing developments have access to both wireless and open-access fixed line telecommunications services.
- 23. A set of rules for providing telecommunications in new developments is also needed. We recommend this be included in the proposed national direction for infrastructure, and planning standards. Australia's [Telecommunications in new developments policy 2024](#) provides a useful precedent, but only provides the policy framework. We also need enforceable rules to be able to provide the connectivity that New Zealanders demand and on which economic growth depends.
- 24. A related issue concerns allowing out of sequence development (via private plan changes), which can make it difficult to provide connectivity to new developments. The telecommunications sector needs early visibility of developments to be able to find sites for infrastructure that meet the needs of telecommunications providers and residents. This visibility can be provided through the creation of a digital national spatial plan and platform which all regional spatial plans integrate with, which is supported by access to real-time growth data including resource and building consents issued. A digital platform provides the opportunity for developers to start to flag potential out of sequence proposals, and for infrastructure providers to

highlight infrastructure constraints. Telecommunication operators would use the real-time data for network planning.

*Acknowledge the need for supporting infrastructure in the NPS-UD*

25. Updating the NPS-UD to address housing issues provides an opportunity to recognise the role that supporting infrastructure (such as telecommunications, but also electricity, gas and water etc) plays in ensuring a livable and well functioning urban environment. This infrastructure needs to be located where people live, work and gather. Reflecting this in the NPS would pave the way for better engagement with councils and communities.
26. If you have questions about our submission please contact [kim.connolly-stone@tcf.org.nz](mailto:kim.connolly-stone@tcf.org.nz) in the first instance.