

# Updating the National Environmental Standards for Telecommunications

A submission from

The Internet Providers Association of New Zealand Inc  
(ISPANZ)

26<sup>th</sup> July 2025

Thank you for the opportunity to comment on Package 1, part of your consultation on proposed new and amended national direction to improve operation of the resource management system under the Resource Management Act 1991. ISPANZ' members are internet service providers, so our comment will be limited to Attachment 1.5, your proposed amendments to the Resource Management (National Environmental Standards for Telecommunications Facilities) Regulations 2016 (NESTF).

ISPANZ welcomes your proposals and agrees with them, with the specific exceptions and comments below:

Item	Comment
Regulation 6 – Meaning of baseline pole and baseline date	Agree, but note that we are concerned that, with buildings in many zones now allowed to be three stories high, the specific dimension limits must allow poles that are tall enough.

Regulations 27(5) and 29(4) on the pole height rules for new or existing poles in the road reserve	We prefer Option 2.
Regulations 27(7) and 29(2)(b) on the headframe rules for new or existing poles in the road reserve	We prefer Option 2.
Regulation 33(7) on the pole height rules for new or existing poles not in road reserve and in commercial, industrial, rural or mixed-use zones Note this excludes residential zones.	We prefer Option 2.
Regulation 37(4)(a) on the attachment rules for the top of the antenna	We prefer Option 2.
New Regulated Activity 2: Renewable electricity generators	It is most important for there to be nationally consistent standards for renewable electricity generators as this will simplify the installation and operation of renewable energy electricity generators on facilities in rural zones. We support this proposal most strongly.

Thank you again for the opportunity to comment on your proposals to change the National Environmental Standards for Telecommunications Facilities.



David Haynes

Chief Executive