

29 July 2015

Mark Heffernan
Land Access Project Team
Ministry of Business, Innovation & Employment
PO Box 1473
Wellington 6140

Via email: landaccess2015@mbie.govt.nz

Dear Mark

Land Access for Telecommunications

Local Government New Zealand (LGNZ) welcomes the opportunity to comment on the Ministry of Business, Innovation and Employment's discussion document "Land Access for Telecommunications". This submission has been prepared on behalf of all our 78 member councils.

LGNZ supports the Government's roll-out of Ultra-fast Broadband (UFB) and the benefits this infrastructure can provide to communities and businesses across New Zealand. It is important that the Ministry address emerging land access issues for telecommunication providers to help facilitate this rollout. We note the Ministry's proposals to:

- use the ratepayer database as a source of contact information for people whose property may be affected by a UFB installation (as is the current practice); and
- include some form of notice regarding the ongoing right of access in the Land Information Memorandum (LIM) maintained by local councils.

We are concerned that the discussion document provides little detail on what level of information would be included in the LIM and the timeframe for introducing this requirement. Nor does the discussion document consider what additional workload this could place on councils and the timeframes that the network operators would expect this information to be made available. It is important that the process for capturing information is efficient and cost-effective for all parties, and that consistent information is captured across the country. The Certificate of Title should also be considered as an option, including information alongside existing easement details. If these proposal proceeds, we strongly encourage the Ministry to discuss these changes with LGNZ and its member councils to develop a workable solution.

If you wish to discuss any of these points further, please contact Karen Collins, Principal Policy Advisor, on 04 924 1202 or karen.collins@lgnz.co.nz.

Yours sincerely



Malcolm Alexander
Chief Executive
Local Government New Zealand