

**SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR  
PLAN, CHANGE OR VARIATION**

*Clause 6 of Schedule 1, Resource Management Act 1991*

**To** Buller District Council, Grey District Council and Westland District Council

Name of submitter: Radio New Zealand (RNZ)

- 1 This is a submission on the proposed Te Tai o Poutini Plan (the **Proposed Plan**).
- 2 RNZ could not gain an advantage in trade competition through this submission.
- 3 The specific provisions of the proposal that RNZ's submission relates to are set out in **Schedule 1** to this submission.
- 4 RNZ welcomes the opportunity to submit on the Proposed Plan. RNZ is generally supportive of the Proposed Plan, subject to the amendments in **Schedule 1**.
- 5 RNZ does wish to be heard in support of the submission.
- 6 A summary of RNZ's facilities in the West Coast region and reasons for RNZ's submission are set out below.

**Background**

- 7 RNZ is a Crown entity established under the Radio New Zealand Act 1995. RNZ leases the site at Cape Foulwind, Westland from the Department of Conservation and owns and operates radio transmission facilities at that site (*RNZ's Facilities*).
- 8 The radiocommunication activities from RNZ's Facilities are carried out by RNZ and other broadcasters, using equipment that is owned, maintained and operated by each broadcaster.
- 9 It is important that the continued operation of RNZ's national transmission network can occur unimpeded. RNZ's Facilities are an integral and important part of RNZ's national communication network, and it is appropriate that the Proposed Plan recognises this and provides for RNZ's activities.
- 10 RNZ's Facilities perform an important role in, among other things, providing news and information to the public and performing a civil defence role (radio is a key communication tool in the event of natural disasters and RNZ is designated as a Lifeline Utility under the Civil Defence Emergency Management Act 2002).
- 11 As a lifeline utility, it is critically important that RNZ is not unduly restricted from carrying out activities that are fundamental to the ongoing operation of its transmission activities.

**RNZ's Facilities at Cape Foulwind**

- 12 RNZ's Facilities at Cape Foulwind, Westland include:

- 12.1 a 45 metre guyed mast with a concrete anti-coupling unit at its base;
  - 12.2 a corrugated iron roof transmitter building located 95 metres to the North East of the mast; and
  - 12.3 a diesel generator located in a separate smaller concrete block / concrete roof building on the North Western side of the transmitter building.
- 13 RNZ's Facilities broadcast multiple radio programmes (and carry out civil defence functions) to the West Coast and surrounding areas. The rest of the facility consists of underground wires and cables.
- 14 The location of RNZ's Facilities is shown in **Figure 1** below.



*Figure 1: Location of RNZ's Cape Foulwind transmitter site*



Figure 2: Location of RNZ's Cape Foulwind transmitter site

**RNZ's submission – general comments**

15 Due to its integral civil defence role, RNZ considers the Proposed Plan needs to provide greater recognition and protection of RNZ's Facilities. The Proposed Plan should provide appropriate policies and objectives that better recognise:

15.1 The critical contribution that infrastructure and network utility operations (such as RNZ's Facilities) make to the social, economic and cultural wellbeing of the district, as well as health and safety;

15.2 The technical and operational constraints that limit the geographic location in which network utilities in general, and RNZ's Facilities in particular, can operate, particularly in relation to land use, subdivision and development; and

15.3 The need to avoid "reverse sensitivity" effects on network utilities for the benefit of the community.

16 RNZ's primary concern is that subdivision and development in proximity to its transmitter sites could lead to issues of safety and reverse sensitivity on its transmission. Generally, the Proposed Plan appropriately recognises this, but RNZ seeks further changes where required.

**RNZ's management of electromagnetic radiation**

17 The effects of electromagnetic radiation (EMR) from RNZ's transmitter masts are not well understood across New Zealand. Radiation from the masts can induce dangerous EMR levels into nearby tall metallic objects through EMR coupling.

18 There are two types of physical effects which can arise from EMR exposure. When assessing the Radio Frequency fields (RF fields) and determining the General Public Exclusion Zone, RNZ consider both of these effects:

- 18.1 Thermal effects are tissue heating and heat stress.
- 18.2 Athermal effects are electro-stimulation of the nervous system, acoustical sensations, and electrical shocks and burns associated with touching passively energised metallic objects in the RF field.
- 19 Outside the General Public Exclusion Zone the primary concern for RNZ is parasitic re-radiation. This occurs when a tall structure absorbs and re-radiates energy from a mast, and is a common issue with cranes and 'Elevated Work Platforms' near AM transmitter sites. In some cases, people can receive contact burns from metallic objects, or work at heights that expose them to EMR levels above general public limits. This is primarily a risk for people constructing or working on tall structures near RNZ's sites. Controls are therefore required around the crane or Elevated Work Platform to achieve compliance with safe standards.
- 20 RNZ manage the very high EMR levels close to the mast in line with current and international radiation standards. However, structures outside RNZ's immediate control, but nevertheless in close proximity to the masts, also need to be carefully managed.
- 21 There is a risk that developers of adjacent properties unknowingly design and build structures which do not meet NZ EMR regulations which is dangerous to both construction staff and occupants of those structures. For this reason, RNZ frequently works with other infrastructure providers and construction companies to maintain the safety of workers.
- 22 The risk of EMR coupling between RNZ masts and other structures is directly related to how far the structure is from the mast and the vertical height of the structures, along with the strength of the signal. Based on RNZ's specific EMR assessment at its facilities on the West Coast, structures greater than 18 metres in height within 1000 metres of the Cape Foulwind transmitter may result in EMR levels that require specific consideration.
- 23 RNZ would like to work with developers who are constructing elevated structures near RNZ's transmitters to ensure that a site-specific and construction materials-specific EMR assessment is undertaken in order to ensure safety. It is therefore important that RNZ is consulted and given the opportunity to work with land users to ensure workers and/or occupants are not exposed to unsafe EMR levels.
- 24 RNZ's specific relief is set out in Schedule 1 to this submission. RNZ is seeking that an advice note be added for to building height standards for Open Space Zone, Rural Residential Precinct and General Rural Zone, for structures within 1,000m of RNZ's facilities. This note will highlight the risk of EMR coupling creating issues with safety. This submission is also seeking the note regard RNZ as likely to be considered an affected party for tall developments within 1,000m of its transmitters. Notification to RNZ will provide an avenue for RNZ to work with developers.

### **Reverse sensitivity**

- 25 RNZ transmitters across the country are particularly susceptible to reverse sensitivity effects and it is critically important that these effects, which have the ability to significantly restrain RNZ's operations, are avoided.
- 26 Reverse sensitivity effects are the adverse effects that a new "sensitive" land use can have on existing activities, i.e. they are effects caused by new development. For example:
- 26.1 RNZ has had direct experience of people, who live near some of its sites, complaining about interference to their electronic devices after they have purchased land and built a house near a transmitter (television reception and, potentially, broadband, telephone signals, burglar alarms and intercom units can be adversely affected near a transmitter);
- 26.2 Nearby residents might not be happy that, on the occasions it is used (during emergencies or for testing purposes), RNZ's back-up generator makes a certain amount of noise; and
- 26.3 Residents might not be happy about being able to see large radio masts from their houses.
- 27 RNZ has in the past had to relocate transmitter facilities as a result of increased complaints from new residents moving near its facilities. This is a last resort for RNZ and is extremely disruptive and costly.

### **Conclusion**

- 28 It is important that the Proposed Plan specifically recognises the safety risks associated with EMR and provides for the avoidance of reverse sensitivity effects.
- 29 RNZ's Facilities are located within the Open Space Zone and are surrounded by Rural Zones. As it stands, the Proposed Plan provides protections against reverse sensitivity in the Rural Zones and RNZ is supportive of this. RNZ considers minor amendments set out in **Schedule 1** are required to ensure structures proposed to locate in close proximity to its facilities are subject to a specific EMR assessment and that its facilities are adequately recognised and provided for to avoid reverse sensitivity effects.

**Signed** for and on behalf of Radio New Zealand by its solicitors and authorised agents  
Chapman Tripp



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**SCHEDULE 1 – SPECIFIC SUBMISSIONS ON POLICIES AND OBJECTIVES IN THE PROPOSED TE TAI O POUTINI PLAN  
ON BEHALF OF RADIO NEW ZEALAND LIMITED**

Objective/Policy/Rule	Proposed Wording	Support/Oppose	Comment and decision sought
<b>PART 1 – INTRODUCTION AND GENERAL PROVISIONS</b>			
<b>INTERPRETATION - Definitions</b>			
Critical Infrastructure	means the rail network, state highways, special purpose roads, airports, wastewater, reticulated water and stormwater plants defence facilities, telecommunications networks and electricity generation, transmission and distribution assets	Support with amendment.	<p>RNZ support a definition of “critical infrastructure” that is important in the case of an emergency.</p> <p>However, RNZ seek that radiocommunication networks are also recognised. As explained above, RNZ’s facilities serve a vital civil defence role alongside other activities contemplated in the definition.</p> <p>The definition of “regionally significant infrastructure” in the West Coast Regional Policy Statement (RPS) includes reference in subclause (i) to telecommunications and radio communications facilities. The Proposed Plan definition of critical infrastructure should reflect the definition contained in the RPS.</p> <p>Amend as follows:</p> <p><i>“means the rail network, state highways, special purpose roads, airports, wastewater,</i></p>

Objective/Policy/Rule	Proposed Wording	Support/Oppose	Comment and decision sought
			<i>reticulated water and stormwater plants, defence facilities, telecommunications <u>and radiocommunications</u> networks and electricity generation, transmission and distribution assets"</i>
Existing buildings and structures	<p>means buildings and structures that:</p> <ul style="list-style-type: none"> <li>a. Were lawfully established at the date of notification of the Plan; or</li> <li>b. Where resource consent has been granted at the date of notification of the Plan; or</li> <li>c. Where building consent has been granted for an activity lawfully approved under a previous District Plan.</li> </ul>	Support.	RNZ support the definition provided its relief below for the definition of "lawfully established" is accepted.
Height	means the vertical distance between a specified reference point and the highest part of any feature, structure or building above that point.	Support.	Retain definition of "height" as notified.
Infrastructure	<p>means the same as Section 2 of the RMA</p> <p>...</p>	Support.	Retain definition of "infrastructure" as notified.
Lawfully established	means activities permitted through a rule in a plan, a resource consent, a national environmental standard or by an existing use right (as provided for in Section 10 of the RMA). In the case of mineral extraction it also includes an activity permitted through a Coal	Support with amendment.	RNZ support the definition of lawfully established but consider that specific recognition of activities established and



Objective/Policy/Rule	Proposed Wording	Support/Oppose	Comment and decision sought
	Mining Licence issued under the Coal Mines Act (1979).		<p>permitted by way of designation is appropriate.</p> <p>Amend the definition as follows:</p> <p><i>means activities permitted through a rule in a plan, a resource consent, a national environmental standard, <u>a designation</u>, or by an existing use right (as provided for in Section 10 of the RMA). In the case of mineral extraction it also includes an activity permitted through a Coal Mining Licence issued under the Coal Mines Act (1979).</i></p>
Maintenance	<p>means,</p> <p>a. In relation to infrastructure and renewable electricity generation activities, any work or activity necessary to continue the operation and / or functioning of existing infrastructure. It does not include upgrading.</p> <p>b. In relation to historic heritage...</p>	Support.	Retain definition of "maintenance" as notified.
Network utility operator	<p>has the same meaning as in s 166 of the RMA ..</p> <p>...</p>	Support.	Retain definition of "Network utility operator" as notified.
Reverse sensitivity	means the potential for an approved, existing or permitted activity to be compromised or constrained, by the more recent establishment or alteration of another activity which may be sensitive to the actual,	Support.	Retain definition of "reverse sensitivity" as notified.

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	potential or perceived adverse environmental effects generated by an approved, existing or permitted activity.		
Sensitive activity	means any: <ul style="list-style-type: none"> <li>a. residential activity;</li> <li>b. visitor accommodation;</li> <li>c. retirement home;</li> <li>d. healthcare facility;</li> <li>e. community facility; and</li> <li>f. educational facility.</li> </ul>	Support.	Retain definition of "sensitive activity" as notified.
Structure	has the same meaning as in section 2 of the RMA ...	Support.	Retain definition of "structure" as notified.
Upgrading	means in relation to infrastructure and renewable electricity generation activities, the improvement or increase in carrying capacity, operational efficiency, security or safety of existing infrastructure and renewable electricity generation activities, but excludes maintenance and repair	Support.	Retain definition of "upgrading" as notified.
<b>PART 2 - DISTRICT WIDE MATTERS</b>			
<b>Strategic Directions – Connections and resilience - Ngā Hononga me te Manawa Titi</b>			
CR-O2	To enable and protect the continued function and resilience of critical infrastructure and connections and facilitate their quick recovery from adverse events	Support.	Subject to RNZ's requested relief on the definition of "critical infrastructure", RNZ support this objective and seek that it is retained as notified.

Objective/Policy/Rule	Proposed Wording	Support/Oppose	Comment and decision sought
<b>Strategic Directions – Urban form and development - Te āhua me te whanaketanga o te tāone</b>			
UFD-01	<p>To have urban environments and built form on the West Coast/Te Tai o Poutini that:</p> <ol style="list-style-type: none"> <li>1. Are attractive to residents, business and visitors;</li> <li>2. Have areas of special character and amenity value identified and their values maintained;</li> <li>3. Support the economic viability and function of town centres;</li> <li>4. Recognise the risk of natural hazards whereby new development is located in less hazardous locations;</li> <li>5. Promote the re-use and re-development of buildings and land, including private and public land;</li> <li>6. Support inclusivity and housing choice for the diversity within the community now and into the future;</li> <li>7. Improve overall accessibility and connectivity for people, transport (including walking and cycling) and services;</li> <li>8. Promote the safe, efficient and effective provision and use of infrastructure, including the optimisation of the use of existing infrastructure and protection of critical infrastructure;</li> <li>9. Maintain the health and wellbeing of waterbodies, freshwater ecosystems and receiving environments; and</li> </ol>	Support.	Subject to RNZ’s requested relief on the definition of “critical infrastructure”, RNZ support this objective, particularly 8. It is important that infrastructure is protected from incompatible activities.

Objective/Policy/Rule	Proposed Wording	Support/Oppose	Comment and decision sought
	10. Promote and enhance the distinctive character of the districts' towns and settlements.		
<b>Energy Transport and Infrastructure – Infrastructure</b>			
INF-O1	To enable the safe, efficient and sustainable development, operation, maintenance and upgrading of utilities and infrastructure, to meet the needs of the West Coast/Te Tai o Poutini	Support with amendment.	<p>RNZ support the direction that provides for the continued operation, maintenance and upgrading of existing infrastructure.</p> <p>RNZ consider the objective should highlight critical infrastructure to recognise its importance.</p> <p>Amend as follows:</p> <p><i>“To enable the safe, efficient and sustainable development, operation, maintenance and upgrading of utilities and infrastructure, <u>in particular critical infrastructure</u>, to meet the needs of the West Coast/Te Tai o Poutini”</i></p>
INF-O2	To protect utilities and infrastructure from the adverse effects of incompatible subdivision, land use and development	Support.	<p>RNZ supports the objective to protect utilities and infrastructure from incompatible land use. RNZ consider the objective should also specifically refer to reverse sensitivity effects.</p> <p>Amend as follows:</p>

Objective/Policy/Rule	Proposed Wording	Support/Oppose	Comment and decision sought
			<p><i>"To protect utilities and infrastructure from the adverse effects, <u>including reverse sensitivity effects</u>, of incompatible subdivision, land use and development"</i></p>
INF-O5	<p>The adverse effects of infrastructure on the environment are minimised, while recognising:</p> <ul style="list-style-type: none"> <li>a. The functional and operational needs of infrastructure; and</li> <li>b. That positive effects of infrastructure may be realised locally, regionally, or nationally.</li> </ul>	Support.	<p>RNZ supports this objective, in particular the recognition of technical, operation and functional needs of infrastructure and that it may have positive effects.</p>
INF-P1	<p>Recognise and provide for the positive social, economic, cultural and environmental benefits from the development, continued operation and upgrading of utilities and infrastructure.</p>	Support.	<p>RNZ supports recognition of the benefits associated with infrastructure. RNZ considers the benefits of critical infrastructure to the region could be highlighted in this policy.</p> <p>Amend as follows:</p> <p><i>"Recognise and provide for the positive social, economic, cultural and environmental benefits from the development, continuing operation and upgrading of utilities and infrastructure, <u>in particular critical infrastructure</u>."</i></p>

Objective/Policy/Rule	Proposed Wording	Support/Oppose	Comment and decision sought
INF-P2	<p>Manage the design and location of utilities and infrastructure, including when sited in overlays in a way which considers:</p> <ul style="list-style-type: none"> <li>a. Locational, technical and operational constraints;</li> <li>b. Resilience to natural hazards and climate change;</li> <li>c. Poutini Ngāi Tahu requirements for discharge of wastewater to land;</li> <li>d. Benefits of co-location of infrastructure;</li> <li>e. That positive effects of infrastructure may be realised locally, regionally, or nationally; and</li> <li>f. The need to minimise adverse effects on the environment</li> </ul>	Support.	<p>RNZ supports this policy, particularly the recognition that locational, technical and operational constraints ought to be considered.</p> <p>Subject to RNZ's request relief on the definition of "critical infrastructure", RNZ consider the policy ought to specifically provide for the importance of critical infrastructure.</p> <p>Amend as follows:</p> <p><i>"Manage the design and location of utilities and infrastructure, including when sited in overlays in a way which considers:</i></p> <p>...</p> <p><i>e. That positive effects of infrastructure, <u>in particular critical infrastructure</u>, may be realised locally, regionally, or nationally; and</i></p> <p><i>f..."</i></p>
INF-P3	<p>Manage reverse sensitivity effects from subdivision, use and development, on utilities and infrastructure to ensure their safe, secure and efficient operation.</p>	Support with amendment.	<p>RNZ support a policy that addresses reverse sensitivity effects.</p> <p>Subject to its relief on the definition of "critical infrastructure", RNZ seek that this is expressly included in the policy. Further,</p>

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			<p>RNZ considers the policy wording should be strengthened to recognise the significant chilling effect reverse sensitivity can have on infrastructure, and the difficulty in addressing this effect once it arises.</p> <p>Amend as follows:</p> <p><i>"<u>Manage Avoid</u> reverse sensitivity effects from subdivision, use and development, on utilities and infrastructure, <u>in particular critical infrastructure</u>, to ensure their safe, secure and efficient operation."</i></p>
INF-P6	<p>Provide flexibility for network utilities to adopt new technologies that:</p> <ol style="list-style-type: none"> <li>a. Improve access to, and efficient use of, networks and services;</li> <li>b. Allow for the re-use of redundant services and structures where they are safe and operating to required standards</li> <li>c. Increase resilience, safety or reliability of networks and services;</li> <li>d. Result in environmental benefits and enhancements; or</li> <li>e. Promote environmentally sustainable outcomes including green infrastructure and the increased utilisation of renewable resources.</li> </ol>	Support.	RNZ support this policy and seek that it is retained as notified.

Objective/Policy/Rule	Proposed Wording	Support/Oppose	Comment and decision sought
INF-R1	<p><b>Infrastructure Permitted Activity Performance Standard</b></p> <p><b>Activity Status Permitted</b></p> <p>Where</p> <ol style="list-style-type: none"> <li>1. Electric and Magnetic fields - An activity generating electric or magnetic fields does not exceed the maximum exposure level listed in the International Commission on Non-ionizing Radiation Protection Guidelines for limiting exposure to time-varying electric and magnetic fields (1Hz - 100 kHz) (Health Physics (6):818-836; 2010), and the recommendations from the World Health Organisation's monograph Environmental Health Criteria 238, June 2007; and</li> <li>2. Radio Frequency Fields - An activity generating radio frequency fields does not result in radio frequency field levels that exceed the maximum exposure level of the general public in New Zealand Standard NZS 2772.1:1999 Radiofrequency fields - Maximum exposure levels - 3kHz to 300 GHz.</li> </ol> <p><b>Activity status where compliance not achieved:</b> Non-complying</p>	Support.	<p>Although RNZ's activities are authorised by designations, RNZ support a permitted activity standard for infrastructure.</p> <p>RNZ already comply with NZS 2772.1:1999 and support its inclusion in the Proposed Plan.</p>



Objective/Policy/Rule	Proposed Wording	Support/Oppose	Comment and decision sought
INF-R4	<p><b>Temporary Network Activities</b></p> <p><b>Activity Status Permitted</b></p> <p>Where:</p> <ol style="list-style-type: none"> <li>1. The temporary network is operated by a network utility operator;</li> <li>2. The temporary network activity is:               <ol style="list-style-type: none"> <li>i. For up to a period of 24 months following a national, regional or local state of emergency declaration; or</li> <li>ii. For up to a period of four weeks to provide for additional capacity; and</li> </ol> </li> <li>3. All performance standards in Rule INF - R1 are complied with; and</li> <li>4. The utility must be removed from the site when operation ceases and the site reinstated.</li> </ol> <p><b>Activity status where compliance not achieved:</b> Discretionary</p>	Support	Although RNZ's activities are authorised by designations, RNZ support a permitted activity rule for temporary network activities in the event RNZ needs to temporarily undertake activities not authorised by the designation.
INF-R7	<p><b>Installation, extension, maintenance, operation , upgrade and repair of lines, underground pipelines and ancillary vehicle access tracks erected by a Network Utility Operator</b></p> <p><b>Activity Status Permitted</b></p> <p>Where</p>	Support	RNZ supports a permitted activity status for works to lines, etc. by Network Utility Operators.

Objective/Policy/Rule	Proposed Wording	Support/Oppose	Comment and decision sought
	<ol style="list-style-type: none"> <li>1. All performance standards in Rule INF - R1 are complied with</li> <li>2. These are not gas pipelines regulated under Rule INF - R3;</li> <li>3. Where any realignment, relocation or replacement of a network utility pole, tower, structure, building or minor utility structure is within 5m of the alignment or location of the original existing pole, tower, structure, building, or minor utility structure;</li> <li>4. A replacement pole, tower or structure does not exceed the height of the original pole, tower, or structure by more than 30 percent, measured from the top of the foundation;</li> <li>5. The diameter or width of the replacement pole does not exceed twice that of the replaced pole at its widest point, and; where a single pole is replaced with a pi pole, the width of the pi pole structure must not exceed three times that of the replaced pole at its widest point;</li> <li>6. Additional conductors or lines do not increase the number of conductors or lines by more than 100 percent;</li> <li>7. The building footprint or the footprint of the structure does not increase by more than 30 percent of the existing building or structure, excluding any pole or pi pole structure provided for in 4 above;</li> <li>8. The largest face area of a replacement panel antenna or the diameter of a replacement dish</li> </ol>		

Objective/Policy/Rule	Proposed Wording	Support/Oppose	Comment and decision sought
	<p>antenna does not increase by more than 20 percent;</p> <p>9. There are no additional towers; and</p> <p>10. A pole is not replaced with a tower.</p> <p>Advice Note: Where the activities undertaken under this rule are located within an Outstanding Natural Feature or Landscape, earthworks associated with the activity are Permitted under Rules NFL - R6 and NFL - R8.</p> <p><b>Activity status where compliance not achieved:</b> Discretionary</p>		
INF-R26	<p><b>Installation, extension, maintenance, operation, minor upgrade and repair of lines, poles and towers erected by a Network Utility Operator not meeting Permitted Activity standards</b></p> <p><b>Activity Status Discretionary</b></p> <p><b>Activity status where compliance not achieved:</b> N/A</p>	Support.	RNZ supports this rule.
INF-R27	<p><b>Temporary Network Activities and New Network Utility Customer Connections not meeting Permitted Activity standards</b></p> <p><b>Activity Status Discretionary</b></p>	Support.	RNZ support discretionary activity status for temporary network activities where permitted activity standards are not met.

Objective/Policy/Rule	Proposed Wording	Support/Oppose	Comment and decision sought
	<p><b>Activity status where compliance not achieved:</b> N/A</p>		
INF-R28	<p><b>Any infrastructure activity which does not meet with Performance Standards in Rule INF - R1, or any rule which refers to those standards, in relation to Electric Fields, Magnetic Fields or Radio Frequency Fields</b></p> <p><b>Activity Status Non-Complying</b></p> <p><b>Activity status where compliance not achieved:</b> N/A</p>	Support.	<p>RNZ support non-complying activity status for infrastructure that does not comply with permitted activity standards.</p> <p>RNZ already complies with standards that relate to Radio Frequency Fields and support their inclusion in the Proposed Plan.</p>
<b>PART 3 – Area Specific Matters</b>			
<b>ZONES AND DEVELOPMENT AREAS</b>			
<b>Open Space and Recreation Zones - Ngā Mokowā Pōaha me ngā Takiwā Hākinakina</b>			
OSRZ-O1	<p>Development and activities should complement and not conflict with the functions and values of the particular open space and the surrounding environment. Where appropriate open space accommodates a range of functions.</p>	Support.	<p>RNZ support this objective. The maintenance of an open space environment, and consideration of the surrounding environment, will reduce the potential for activities to be established that conflict with infrastructure such as RNZ's Facilities that are located in the Open Space Zone.</p> <p>Retain OSRZ-O1 as notified.</p>

Objective/Policy/Rule	Proposed Wording	Support/Oppose	Comment and decision sought
OSRZ-O2	<p>To recognise the different functions, values and purpose of open space on the West Coast through providing for three Open Space and Recreation Zones:</p> <ul style="list-style-type: none"> <li>a. The NOSZ - Natural Open Space Zone with high natural values and a low level of development and built form;</li> <li>b. The SARZ - Sport and Active Recreation Zone with sport and active recreation values and associated buildings and facilities; and</li> <li>c. The OSZ - Open Space Zone with a very wide range of values including passive and active recreation, local purposes and pastoral farming.</li> </ul>	Support.	<p>RNZ support recognition of the values and purpose of open space on the West Coast. Limiting development in the OSZ will have the ancillary benefit of reducing the risk of incompatible activities near RNZ's Facilities.</p> <p>Retain OSRZ-O2 as notified.</p>
OSRZ-P2	Open space may accommodate recreational, cultural, natural, heritage, access and amenity values and functions and ancillary activities to support these, where this fits with the purpose of the open space and its classification under any relevant Act	Support.	RNZ support a policy to recognise that open space may accommodate certain activities where they fit with the purpose of open space.
OSRZ-P3	Buildings and structures should be designed and sited to be compatible with the function and predominant purpose of the open space and fit within the character and amenity of the surrounding area	Support.	<p>RNZ support the direction for buildings and structures to be compatible with the predominant purpose of open space and amenity of the surrounding area.</p> <p>Retain OSRZ-P3 as notified.</p>

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OSRZ-P11	The OSZ - Open Space Zone primarily provides for passive and active recreation activities, community facilities, campgrounds and cemeteries and limited associated facilities and structures	Support.	RNZ support a policy to primarily provide for recreation and community activities while limiting associated structures.  Retain OSRZ-P11 as notified.
OSRZ-P12	Enable activities and facilities within the OSZ - Open Space Zone that: <ul style="list-style-type: none"> <li>a. Are consistent with the intended purpose, character and qualities of the OSZ - Open Space Zone; and</li> <li>b. Contribute to the overall health and wellbeing of the community; and</li> <li>c. Minimise adverse effects on the character and amenity values of the surrounding area</li> </ul>	Support.	RNZ support the direction to enable activities that are consistent with the purpose of open space and minimise the effects on the surrounding area.  Retain OSRZ-P12 as notified.
OSZ-R1	Activity Status Permitted Where: <ol style="list-style-type: none"> <li>1. The maximum building height above ground level is 7m;</li> <li>2. The maximum gross floor area is 100m<sup>2</sup>;</li> <li>3. Buildings are setback: <ul style="list-style-type: none"> <li>i. 4.5m from the road boundary; and</li> <li>ii. 3m from any RESZ - Residential Zone or SETZ - Settlement Zone boundary.</li> </ul> </li> </ol>	Support with amendment	RNZ generally supports the proposed rules, which limit development in the OSZ to those activities closely associated with relevant recreation and conservation activities.  As stated in the body of the submission above, RNZ's concern is that the potential for safety risks arising from the construction of tall structures near RNZ's Facilities. This risk can be readily addressed with proper construction techniques and safety measures.

Objective/Policy/Rule	Proposed Wording	Support/Oppose	Comment and decision sought
	<p>4. External storage is screened by a 1.8m fence or landscaping so that it is not visible from any adjoining residential zone boundary;</p> <p>5. Fences, walls and retaining walls are a maximum 2m height above ground level;</p> <p>6. No building shall project beyond a building envelope defined by a recession plane as outlined in Appendix Two to commence 2.5m above any RESZ - Residential Zone or SETZ - Settlement Zone boundary except where the neighbouring property owner's written approval is provided to the Council at least 10 working days prior to the works commencing. This standard does not apply to:</p> <ul style="list-style-type: none"> <li>iii. Road boundaries;</li> <li>iv. Buildings on adjoining sites that have a common wall along the boundary;</li> <li>v. Boundaries abutting an access lot or right of way in which case the furthest boundary of the access lot or right of way may be used for assessing compliance with this standard;</li> <li>vi. Antennas, aerials, satellite dishes (less than 1m in diameter), chimneys, flues and architectural features (e.g. finials, spires) provided these do not exceed the recession plane by more than 3m vertically; and</li> <li>vii. Solar panels and solar water heaters provided these do not exceed the height in relation to</li> </ul>		<p>RNZ supports the requirement for all permitted activities to comply with the OSZ-R1 standards, but considers the additional activity standard below is appropriate. Notification to RNZ of any applications for tall structures within 1,000m will ensure safety risks to the applicant. RNZ is happy to consider alternative wording or rules structures that achieve similar outcomes.</p> <p>Amend as follows:</p> <p>...</p> <p>7. <u><i>If any proposed structure within 1,000m of Radio New Zealand's Facilities at Cape Foulwind would be taller than 18m, the safety risks of electromagnetic coupling must be considered and addressed effectively. RNZ should be considered an affected person for the purposes of any consent application.</i></u></p>

Objective/Policy/Rule	Proposed Wording	Support/Oppose	Comment and decision sought
	boundary plane by more than 0.25m vertically.		
OSZ Rules	Rules OSZ-R2 to OSZ-R26	Support.	<p>RNZ generally supports the proposed rules, which limit development in the OSZ to those activities closely associated with relevant recreation and conservation activities.</p> <p>RNZ supports the requirement for all permitted activities to comply with the OSZ-R1 standard, with the proposed amendment noted above.</p>
<b>Rural Zones - Ngā Whāinga me ngā Kaupapa Here</b>			
RURZ-O1	To provide for a range of activities, uses and developments that maintain the amenity and rural character values of the rural environment, while retaining highly productive land and rural activities, and supporting a productive rural working environment	Support.	<p>RNZ support the direction to maintain the amenity and rural character values of the rural environment.</p> <p>Retain RURZ-O1 as notified.</p>
RURZ-P1	<p>Enable a variety of activities to occur within RURZ - Rural Zones while maintaining rural amenity and character. Outside of settlements, activities should:</p> <ul style="list-style-type: none"> <li>a. For buildings and structures have a bulk and location that is characteristic of rural environments;</li> <li>b. Maintain privacy and rural outlook for residential buildings;</li> </ul>	Support.	<p>RNZ support enablement of activities that maintain rural amenity and character. In particular, RNZ support the direction in c. that activities should be compatible with existing development and the surrounding area.</p> <p>Retain RURZ-P1 as notified.</p>



Objective/Policy/Rule	Proposed Wording	Support/Oppose	Comment and decision sought
	<ul style="list-style-type: none"> <li>c. Be compatible with existing development and the surrounding area;</li> <li>d. Have appropriate setbacks from the road and significant natural and cultural features;</li> <li>e. Minimise adverse visual effects if sited on prominent ridges or immediately adjacent to public roads; and</li> <li>f. Have awareness of cultural landscapes and avoid activities being located on the ridgelines and peaks of ancestral mountains</li> </ul>		
RURZ-P6	<p>Recognise that the rural areas may be the most appropriate location for some utility, industrial or commercial uses to establish, where these have a functional relationship with rural areas, provided the character and amenity of the rural areas is maintained and adverse effects are managed.</p>	Support.	<p>RNZ support provision for certain activities where they maintain the character and amenity of the rural environment and where adverse effects can be managed.</p> <p>However, RNZ is concerned that this wording does not adequately recognise some of the limitations infrastructure providers face. Often rural areas are the only functional location for some infrastructure, although there may be no direct relationship with the surrounding rural land itself.</p> <p>Amend as follows:</p> <p><i>Recognise that the rural areas may be the most appropriate location for some utility, industrial or commercial uses to establish, where these have a functional relationship with rural areas, provided the character and</i></p>

Objective/Policy/Rule	Proposed Wording	Support/Oppose	Comment and decision sought
			<p><i>amenity of the rural areas is maintained and adverse effects are managed. <u>In particular, critical infrastructure may have a functional need to be located in rural areas in order to operate effectively.</u></i></p>
RURZ-P16	<p>There should be sufficient buffers provided from infrastructure such as wastewater treatment plants and land disposal areas, transmission infrastructure and water supply catchments to avoid reverse sensitivity effects on the infrastructure.</p>	Support.	<p>RNZ support the direction to maintain sufficient buffers from infrastructure to avoid reverse sensitivity effects.</p> <p>However, RNZ consider a specific reference to telecommunication / radio communication equipment is appropriate as this infrastructure often raises concerns for residents of new developments located nearby.</p> <p>Amend as follows:</p> <p><i>There should be sufficient buffers provided from infrastructure such as wastewater treatment plants and land disposal areas, transmission infrastructure, <del>and</del> water supply catchments <u>and telecommunication and radiocommunications infrastructure</u>, to avoid reverse sensitivity effects on the infrastructure.</i></p>

Objective/Policy/Rule	Proposed Wording	Support/Oppose	Comment and decision sought
SETZ-PREC4	<p><b>Rural Residential Precinct Policy</b></p> <p>Subdivision, use and development within the SETZ – PREC4 – Rural Residential Precinct should maintain the predominant rural character and amenity values, which include:</p> <ul style="list-style-type: none"> <li>a. Low-density residential living and small scale rural activities;</li> <li>b. Open space and privacy around buildings; and</li> <li>c. On-site servicing and a general absence of urban infrastructure.</li> </ul>	Support.	<p>RNZ support the policy to maintain rural character and amenity values within the Rural Residential Precinct.</p> <p>RNZ seek specific reference in the policy to avoid reverse sensitivity effects.</p> <p>Amend as follows:</p> <p><i>Subdivision, use and development within the SETZ – PREC4 – Rural Residential Precinct should maintain the predominant rural character and amenity values, which include:</i></p> <ul style="list-style-type: none"> <li><i>a. Low-density residential living and small scale rural activities;</i></li> <li><i>b. Open space and privacy around buildings; and</i></li> <li><i>c. On-site servicing and a general absence of urban infrastructure.</i></li> <li><i>d. <u>Avoiding reverse sensitivity effects on rural activities and established infrastructure.</u></i></li> </ul>
GRUZ-R1	<p><b>Agricultural, Pastoral or Horticultural Activities and Buildings</b></p> <p><b>Activity Status Permitted</b></p>	Support with amendment.	<p>RNZ support a permitted activity status for buildings that comply with standards and a discretionary status for activities that do not.</p> <p>As stated in the body of the submission above, RNZ’s concern is that the potential</p>

Objective/Policy/Rule	Proposed Wording	Support/Oppose	Comment and decision sought
	<p>Where:</p> <ol style="list-style-type: none"> <li>1. Maximum building height above ground level is: <ol style="list-style-type: none"> <li>i. 10m; except that</li> <li>ii. No building, structure or tree shall protrude into the Airport Approach Path of any airport or aerodrome identified on the planning maps and as described in Appendix Nine;</li> </ol> </li> <li>2. Buildings are setback a minimum of 10m from the road boundary, 20m from the State Highway Boundary, and 10m from internal boundaries;</li> <li>3. ...</li> </ol> <p><b>Advice Note:</b></p> <ol style="list-style-type: none"> <li>1. If land is used for disposal of effluent or solid waste then there may be rules in the Regional Air Plan and Regional Land and Water Plan administered by West Coast Regional Council.</li> <li>2. Quarrying activity within the Pounamu and Aotea Overlays is subject to Rule SASM - R7.</li> </ol> <p><b>Activity status where compliance not achieved:</b> Discretionary</p>		<p>for safety risks arising from the construction of tall structures near RNZ's Facilities. This risk can be readily addressed with proper construction techniques and safety measures.</p> <p>As RNZ has the technical expertise and operational ability to assist applicants in ensuring the risk of EMR coupling is addressed, RNZ seeks the below text is added as an Advice Note. Notification to RNZ of any applications for tall structures within 1,000m will ensure safety risks to the applicant. RNZ is happy to consider alternative wording or rules structures that achieve similar outcomes.</p> <p><b>Advice Note:</b></p> <p><i><u>If any proposed structure within 1,000m of Radio New Zealand's Facilities at Cape Foulwind would be taller than 18m, the safety risks of electromagnetic coupling must be considered and addressed effectively. RNZ should be considered an affected person for the purposes of any such consent application.</u></i></p>

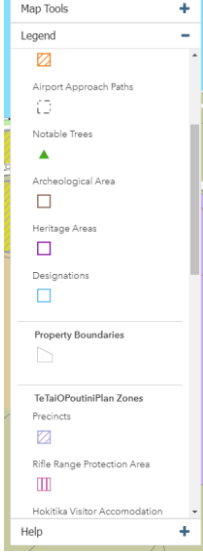
Objective/Policy/Rule	Proposed Wording	Support/Oppose	Comment and decision sought
GRUZ-R1	<p><b>Agricultural, Horticultural and Pastoral Activities and Buildings</b></p> <p><b>Activity Status Permitted</b></p> <p>Where:</p> <ul style="list-style-type: none"> <li>3. Maximum building height above ground level is: <ul style="list-style-type: none"> <li>iii. 10m;</li> <li>iv. 7m for non-residential buildings; except</li> <li>v. No building, structure or tree shall protrude into the Airport Approach Path of any airport or aerodrome identified on the planning maps and as described in Appendix Nine;</li> </ul> </li> <li>4. Buildings are setback a minimum of 10m from the road boundary, 20m from the State Highway Boundary, and 10m from internal boundaries;</li> <li>5. ...</li> </ul> <p><b>Advice Note:</b></p> <p>If land is used for disposal of effluent or solid waste then there may be rules in the Regional Air Plan and Regional Land and Water Plan administered by West Coast Regional Council.</p>	Support with amendment.	<p>RNZ support a permitted activity status for buildings that comply with standards and a discretionary status for activities that do not.</p> <p>As stated in the body of the submission above, RNZ's concern is that the potential for safety risks arising from the construction of tall structures near RNZ's Facilities. This risk can be readily addressed with proper construction techniques and safety measures.</p> <p>As RNZ has the technical expertise and operational ability to assist applicants in ensuring the risk of EMR coupling is addressed, RNZ seeks the below text is added to the Advice Note. Notification to RNZ of any applications for tall structures within 1,000m will ensure safety risks to the applicant. RNZ is happy to consider alternative wording or rules structures that achieve similar outcomes.</p> <p><b>Advice Note:</b></p> <p><i><u>If any proposed structure within 1,000m of Radio New Zealand's Facilities at Cape Foulwind would be taller than 18m, the safety risks of electromagnetic coupling must be considered and addressed</u></i></p>

Objective/Policy/Rule	Proposed Wording	Support/Oppose	Comment and decision sought
	<p><b>Activity status where compliance not achieved:</b> Discretionary</p>		<p><i><u>effectively. RNZ should be considered an affected person for the purposes of any such consent application.</u></i></p>
SETZ-R2	<p><b>Buildings and Sites – Design</b></p> <p><b>Activity Status Permitted</b></p> <p>Where</p> <ol style="list-style-type: none"> <li>1. The maximum height above ground level for buildings is <ol style="list-style-type: none"> <li>i. 10m for residential buildings and Emergency Service Facilities and 7m for accessory buildings...</li> </ol> </li> <li>...</li> <li>6. Buildings are setback from boundaries as follows <ol style="list-style-type: none"> <li>ii. In the SETZ - PREC4 - Rural Residential Precinct all buildings are setback 10m from road boundaries, residential buildings are setback 10m from the internal boundaries and non-residential buildings are setback 5m from internal boundaries;</li> </ol> </li> <li>...</li> </ol> <p><b>Advice Notes:</b></p>	Support with amendment.	<p>RNZ support a permitted activity status for buildings that comply with standards and a discretionary status for activities that do not.</p> <p>As stated in the body of the submission above, RNZ’s concern is that the potential for safety risks arising from the construction of tall structures near RNZ’s Facilities. This risk can be readily addressed with proper construction techniques and safety measures.</p> <p>As RNZ has the technical expertise and operational ability to assist applicants in ensuring the risk of EMR coupling is addressed, RNZ seeks the below text is added to the Advice Note. Notification to RNZ of any applications for tall structures within 1,000m will ensure safety risks to the applicant. RNZ is happy to consider alternative wording or rules structures that achieve similar outcomes.</p> <p><b>Advice Note:</b></p>

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	<p>1. In relation to indigenous vegetation clearance in Kumara Junction developments and Standard 5. it should be noted that indigenous vegetation clearance provisions in the Ecosystems and Biodiversity Chapter also apply;</p> <p>2. Where a residential building or noise sensitive activity is located within:</p> <ul style="list-style-type: none"> <li>i. 80m of a State Highway with a speed limit of 70kph or greater; or</li> <li>ii. 40m of a State Highway with a speed limit of less than 70kph; or</li> <li>iii. 40m of a Railway Line; or</li> <li>iv. The 50 dBA Noise Contour boundary of Franz Josef Heliport; or</li> <li>v. The 55 dBA Noise Contour boundary of the Westport or Hokitika Airports or Greymouth or Karamea Aerodrome. Then the acoustic insulation requirements set out in Rule NOISE - R3 will apply.</li> </ul> <p><b>Activity status where compliance not achieved:</b></p> <p>Discretionary where standards 1-4 are not complied with. Restricted Discretionary where standards 5-6 are not complied with.</p>		<p>1. ...</p> <p>2. ...</p> <p>3.</p> <p><i><u>If any proposed structure within 1,000m of Radio New Zealand's Facilities at Cape Foulwind would be taller than 18m, the safety risks of electromagnetic coupling must be considered and addressed effectively. RNZ should be considered an affected person for the purposes of any such consent application.</u></i></p>
<b>Designations</b>			

Objective/Policy/Rule	Proposed Wording	Support/Oppose	Comment and decision sought																
Radio New Zealand Limited Designations	<table border="1"> <thead> <tr> <th colspan="2" data-bbox="600 272 1285 309">Cape Foulwind Transmission Site</th> </tr> </thead> <tbody> <tr> <td data-bbox="600 309 943 339">Designation unique identifier</td> <td data-bbox="943 309 1285 339">RNZ1</td> </tr> <tr> <td data-bbox="600 339 943 440">Designation purpose</td> <td data-bbox="943 339 1285 440">Radio Communication and Telecommunication (including broadcasting) Purposes and Ancillary Purposes and Land Uses</td> </tr> <tr> <td data-bbox="600 440 943 470">Site identifier</td> <td data-bbox="943 440 1285 470">Part Lot 2 DP 353986</td> </tr> <tr> <td data-bbox="600 470 943 501">Lapse date</td> <td data-bbox="943 470 1285 501">Given effect to</td> </tr> <tr> <td data-bbox="600 501 943 560">Designation hierarchy under section 177 of the Resource Management Act</td> <td data-bbox="943 501 1285 560">N/A</td> </tr> <tr> <td data-bbox="600 560 943 590">Conditions</td> <td data-bbox="943 560 1285 590">None</td> </tr> <tr> <td data-bbox="600 590 943 627">Additional information</td> <td data-bbox="943 590 1285 627">N/A</td> </tr> </tbody> </table>	Cape Foulwind Transmission Site		Designation unique identifier	RNZ1	Designation purpose	Radio Communication and Telecommunication (including broadcasting) Purposes and Ancillary Purposes and Land Uses	Site identifier	Part Lot 2 DP 353986	Lapse date	Given effect to	Designation hierarchy under section 177 of the Resource Management Act	N/A	Conditions	None	Additional information	N/A	Support.	<p>RNZ support the Proposed Plan's description of its designation at Cape Foulwind but observe that the Proposed Plan maps do not show RNZ1. The lack of mapping of RNZ's designation has been something of an ongoing issue, and RNZ considers the preparation of the Te Tai o Poutini Plan provides the appropriate opportunity to resolve this issue.</p> <p>If council files do not record the geographic extent of the designation, RNZ is happy to engage with Council officers and provide information to ensure the designation is accurately mapped.</p> <p>RNZ seek that the planning maps be amended so that RNZ1 is clearly identified in blue outline as indicated by the proposed map legend below:</p>
Cape Foulwind Transmission Site																			
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Conditions	None																		
Additional information	N/A																		



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			 <p>The screenshot shows a map legend panel with the following items:</p> <ul style="list-style-type: none"> <li>Map Tools +</li> <li>Legend -</li> <li>Airport Approach Paths (orange square with diagonal line)</li> <li>Notable Trees (green triangle)</li> <li>Archeological Area (brown square)</li> <li>Heritage Areas (purple square)</li> <li>Designations (blue square)</li> <li>Property Boundaries (grey line)</li> <li>To Tai O Poutini Plan Zones</li> <li>Precincts (blue square with diagonal line)</li> <li>Rifle Range Protection Area (pink square with vertical lines)</li> <li>Hokitika Visitor Accommodation (pink square)</li> <li>Help +</li> </ul>