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30 October 2023

Hearing Evidence – proposed TTPP  
C/o West Coast Regional Council  
P O Box 66  
**Greymouth 7840**

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Dear Sir/Madam

**WCRC evidence for TTPP Hearing – Infrastructure chapter**

The West Coast Regional Council (the Council) does not wish to appear before the proposed TTPP Hearing Panel on the Infrastructure chapter, but we wish to submit brief written evidence regarding our submission point S488.008.

The Council's evidence is attached.

Our contact details for service are:

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We would be grateful for acknowledgement of receipt of our written evidence.

Yours faithfully

Fiona Thomson  
**Planning and Science Manager**

## West Coast Regional Council Written Evidence on TTPP Infrastructure chapter, Permitted Rule INF – R5

### Background

The proposed Te Tai o Poutini Plan (TTPP) Infrastructure chapter's Permitted Rule INF – R5 for Environmental monitoring and extreme weather event monitoring facility has condition 1. which limits the height of monitoring equipment to 4m, and the ground area to 25m<sup>2</sup>.

The West Coast Regional Council (WCRC or the Council) made a submission (S488.008) seeking that the maximum permitted height limit be increased to 10m, to provide for any future new hydrology monitoring poles, towers and antennae that Council seeks to add to its network..

To clarify our submission, the lattice rainfall monitoring towers at alpine sites are between 3-4m in height, but there are four alpine repeater towers which are between 9-10m tall. The Council owns one of these repeater towers, and has telecommunication equipment attached or connected to the other three towers. At lowland sites, poles and posts with solar panels, antennae and a telemetry cabinet are up to 10-12m tall. All of the existing poles, towers and equipment are lawfully established by historic authorisation under the Ministry of Works, and transitional or operative District Plans. This evidence focuses on providing for future new monitoring structures.

### Issue 1

The s42A report recommendation is to reject our change sought to increase the maximum height to 10m. The reason given is *“an increase in height within an area of 25m<sup>2</sup> could result in structures of a significant scale, and this combined with the lack of evidence to support such an amendment is not considered appropriate.....”*.

The Council disagrees with this recommendation and reason, as the area size is not relevant to what we submitted about. Some of Council's existing lowland monitoring sites have small sheds which house connections to a power supply and telemetry equipment, but none of them would exceed 25m<sup>2</sup>. Attached in Appendix 1 are photos of two of Council's monitoring equipment sheds showing their standard size of between 3-9m<sup>2</sup>. Sheds are usually only at lowland sites, although there is a shed at the Mt Bonar repeater site which houses Council's telemetry equipment (Council does not own the shed). Any future new sheds would not exceed the 25m<sup>2</sup> maximum area, so the combination of a 25m<sup>2</sup> and 10m high structure does not apply to our hydrology monitoring equipment.

Only the 4m height limit is an issue for new monitoring poles at lowland sites, and repeater towers in alpine areas. Photos in Appendix 1 show what some existing poles and repeater towers look like, to give an idea of what future ones would look like. At most sites, the telemetry is housed in a small cabinet attached to the pole or repeater tower, and power is supplied by a small solar panel also attached to the pole or tower. The Haast River @ Mt Deelaw site is an exception, it has a repeater module and equipment stored in a 1.5m box attached to the ground. Equipment on lowland poles is attached at a reasonable height to deter vandals and thieves, to ensure monitoring data is picked up by repeaters, and solar panels receive the most light.

The s42A report also recommends to accept a Buller District Council (BDC) submission to delete permitted Rule INF – R5, including deleting the 4m height limit. Although the Council did not further submit in support of this BDC submission, we would support this recommendation as deleting Rule R5 would address our concerns about the 4m height limit. However, there is still a disconnect between the two s42A report recommendations on the WCRC and BDC submissions.

**Decision sought**

If permitted R5 is retained, the maximum height limit in INF – R5 is amended to 10m for environmental monitoring towers, poles and antennae; or R5 is deleted in its entirety.

**Issue 2**

The s42A recommends to accept the BDC submission to add “environmental monitoring equipment” to permitted INF – R6 meteorological facilities, with no conditions on R6. The current R6 Condition 1 would be deleted. Although the Council did not further submit on the BDC submission on R6, we would support this change, as having no conditions would address our concerns about monitoring equipment only being permitted in the Rural or Industrial Zones.

If the current R6 Condition 1 is retained (which only permits Meteorological Facilities in a Rural or Industrial Zone), it could mean that restricted discretionary resource consent might be required for any future new alpine repeater towers with hydrology monitoring equipment in the Natural Open Space Zone on conservation land, or any new poles in other lowland zones such as recreational areas. Council considers this to be unnecessarily onerous given the relatively low environmental impact of the monitoring structures, and there would not be a proliferation of them. If the concern is about the visual and amenity effects, concessions have been granted by the Department of Conservation for all of the existing repeater towers and antennae on conservation land (as well as Council’s smaller lattice towers). The concessions have conditions to minimise visual and amenity effects. The Council would prefer that the risk of having to get consent is removed.

**Decision sought**

Remove Condition 1 from INF – R6.

**Issue 3**

The Council wishes to point out a possible error in the s42A report recommendations on the restricted discretionary Rule INF – R19. The s42A report recommends to retain restricted discretionary Rule INF – R19 for “environmental monitoring and extreme weather event monitoring and meteorological facilities not meeting Permitted Activity standards”. We question how there can be a restricted discretionary default rule if there will be no permitted conditions to be breached, as recommended in the s42A report?

If the permitted Rules are retained with conditions that Council’s new monitoring equipment would not meet in the future, Council could be potentially affected by the s42A recommendation to retain restricted discretionary R19. In our view, restricted discretionary status for Council’s poles, towers and antennae in all zones is unnecessarily onerous, as explained above.

**Decision sought**

Remove restricted discretionary INF – R19.

This ends our written evidence.

**Appendix 1: Photos of WCRC hydrology monitoring equipment huts, lattice towers and antennae**



*Equipment shed amongst bush at Hokitika River @ Gorge monitoring site*



*Equipment shed at Mt Bonar repeater site*



*Pole with cabinet, solar panel and antenna, Buller River @ Te Kuha*



*Haast River @ Mt Deelaw repeater tower, with box containing repeater equipment*



*Mt Bonar repeater tower, height is 9-10m*