

Form 6**FURTHER SUBMISSION IN SUPPORT OF, AND IN OPPOSITION TO, SUBMISSIONS
ON THE PROPOSED FAR NORTH DISTRICT PLAN**

Clause 8 of Schedule 1, Resource Management Act 1991

To Far North District Council

- 1 Name of person making further submission: **Radio New Zealand Limited (RNZ)**
- 2 This is a further submission in support of, and in opposition to submissions (as specified in the table at **Schedule 1**) on the proposed Far North Plan (the *Proposed Plan*).
- 3 RNZ is a person who has an interest in the Proposed Plan that is greater than the interest the general public has. RNZ made an original submission on the Proposed Plan (submitter number 489).
- 4 The attached table in **Schedule 1** sets out:
 - 4.1 The submissions or parts of submissions that RNZ supports or opposes;
 - 4.2 RNZ's reasons for support or opposition; and
 - 4.3 The relief sought by RNZ in relation to those submissions or parts of submissions.
- 5 RNZ does wish to be heard in support of this further submission.

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



Ben Williams
Partner
4 September 2023

Address for service of submitter:

Radio New Zealand
c/- Annabelle Lee
Chapman Tripp
Level 5, PwC Centre
60 Cashel Street
PO Box 2510
Christchurch 8140
Email address: Annabelle.Lee@chapmantripp.com

SCHEDULE 1 – SPECIFIC FURTHER SUBMISSIONS ON BEHALF OF RADIO NEW ZEALAND LIMITED

Submission point	Objective/Policy/Rule	Summary of decision requested	RNZ support/oppose	Decision sought by RNZ
<i>Transpower (Submitter 454)</i>				
019	Definitions	The submitter seeks to amend the definition of “temporary activities” to provide for the temporary use of a generator to provide lifeline utilities.	Support. RNZ supports inclusion of the use of generators that provide lifeline utilities within the definition of “temporary activities”.	Accept the submission. FS304.001
054	I-P11	The submitter seeks to amend the policy to acknowledge that there may be some occasions where infrastructure has a functional or operational need to locate in the Māori Purpose or Treaty Settlement overlay.	Support.	Accept the submission. FS304.002
101	New Policy EW-Px	The submitter seeks a new policy in the Earthworks chapter to protect nationally and regionally significant infrastructure from the adverse effects of earthworks.	Support.	Accept the submission. FS304.003
128	New objectives	The submitters seeks a new objective in each of the zone chapters as follows:	Support in so far as it relates to the Rural Production Zone. RNZ’s facilities are located in this zone and RNZ made a submission in support of RPOZ-O2 (which	Accept the submission. FS304.004

Submission point	Objective/Policy/Rule	Summary of decision requested	RNZ support/oppose	Decision sought by RNZ
		<p><i>"The [x] zone is used by compatible activities and infrastructure, that have a functional or operational need to locate in the zone."</i></p>	<p>refers to the use by compatible activities that have a functional need to be in a rural environment), but would support the recognition of functional <i>and operational</i> requirements.</p>	
109, 129	New policies	<p>The submitter seeks a new policy in each of the zone chapters as follows:</p> <p><i>"Enable compatible activities and infrastructure, that have a functional or operational need to locate in the [x] zone."</i></p>	<p>Support in so far as it relates to the Rural Production Zone. RNZ made a submission in support of RPOZ-O2 (which refers to the use by compatible activities that have a functional need to be in a rural environment), but would support the recognition of functional <i>and operational</i> requirements in the relevant policy framework.</p>	<p>Accept the submission.</p> <p style="color: red;">FS304.005, FS304.006</p>
Top Energy Limited (Submitter 483)				
031	Strategic Directions – new objective	<p>The submitter seeks a new objective for regionally significant infrastructure as follows:</p> <p><i>Regionally Significant Infrastructure is identified and protected.</i></p> <p><i>The benefits of Regionally Significant Infrastructure are recognised and provided for. Avoid, remedy, mitigate or offset adverse effects arising from</i></p>	<p>Support.</p> <p>RNZ supports explicit recognition of the benefits of regionally significant infrastructure in the Strategic Directions chapter.</p>	<p>Accept the submission.</p> <p style="color: red;">FS304.007</p>

Submission point	Objective/Policy/Rule	Summary of decision requested	RNZ support/oppose	Decision sought by RNZ
		<i>the development, operation, maintenance, and upgrading of Regionally Significant Infrastructure.</i>		
035	I-O3	The submitter seeks to amend the objective (which seeks to protect infrastructure from incompatible land use) to capture repair as well as operation, maintenance and upgrading of infrastructure.	Support.	Accept the submission. FS304.008
049	I-P11	The submitter seeks to amend I-P11 as follows: <i><u>Avoid Manage</u> new infrastructure where it will <u>unduly</u> compromise the ability to develop and use land in the Māori Purpose zone or in the Treaty Settlement overlay unless the owners of the land agree to the new infrastructure, <u>while recognising and providing for the operational and functional need of infrastructure to locate in these areas.</u></i>	Support. RNZ supports recognition of the functional and operational needs of infrastructure in the policy.	Accept the submission. FS304.009
051	I-P13	The submitter seeks to reference specific standards and guidelines for electric and magnetic emissions in the policy.	Support. RNZ supports the submission seeking reference to the recognised standards, noting that	Accept the submission. FS304.0010

Submission point	Objective/Policy/Rule	Summary of decision requested	RNZ support/oppose	Decision sought by RNZ
			RNZ operations already comply with these standards.	
Public Health Northland (Submitter 516)				
025	Strategic Directions	The submitter seeks to insert objectives and policies in the Strategic Directions chapter to recognise the promote the benefits of regionally significant infrastructure and to provide for its ongoing maintenance, development and upgrading.	Support. RNZ agrees with the submitter that the proposed objective and policy appropriately give effect to the Northland Regional Policy Statement.	Accept the submission. FS304.011
Hort NZ (Submitter 159)				
028	SD-IE-O2	The submitter seeks to amend SD-IE-O2 so it reads as follows: <i>Recognise and provide for infrastructure and renewable electricity generation activities and ensure that their operation, maintenance and upgrading are not compromised by incompatible subdivision, use and development.</i>	Oppose. RNZ opposes the proposed amendments as they weaken the protection provided by the objective as notified. This is inappropriate for regionally significant infrastructure and lifeline utilities.	Reject the submission. FS304.012
031	I-O3	The submitter seeks to amend I-O3 as follows: <i>Infrastructure is protected from Ensure that infrastructure is not compromised</i>	Oppose. RNZ opposes the proposed amendments as they weaken the protection provided by the	Reject the submission. FS304.013

Submission point	Objective/Policy/Rule	Summary of decision requested	RNZ support/oppose	Decision sought by RNZ
		<i>by incompatible land use, subdivision and development that may result in reverse sensitivity effects to ensure its effective operation, maintenance and upgrading.</i>	objective as notified. This is inappropriate for regionally significant infrastructure and lifeline utilities.	
032	I-P7	<p>The submitters seeks to amend I-P7 as follows:</p> <p>Protect <u>Ensure that regionally significant infrastructure from the effects of is not compromised by incompatible subdivision, use and development including reverse sensitivity effects which may compromise affect the operation and capacity of infrastructure by:</u></p> <p>g) to achieve appropriate protection of local, regional and nationally significant infrastructure</p> <p><u>e (i) recognising that some lines may cross private land.</u></p>	<p>Oppose.</p> <p>RNZ opposes the proposed amendments as they weaken the protection provided by the policy as notified. This is inappropriate for regionally significant infrastructure.</p>	<p>Reject the submission.</p> <p style="text-align: right; color: red;">FS304.014</p>
069	SUB-P11	The submitter considers that SUB-P11 should also list the potential for reverse sensitivity as a matter for consideration.	Support.	<p>Accept the submission.</p> <p style="text-align: right; color: red;">FS304.015</p>

Submission point	Objective/Policy/Rule	Summary of decision requested	RNZ support/oppose	Decision sought by RNZ
101	RPROZ-P5	The submitter considers that RPROZ-P5 should also list the potential for reverse sensitivity as a matter for consideration.	Support.	Accept the submission FS304.016
Mainfreight (Submitter 509)				
007	LIZ-1	The submitter seeks to modify the maximum height in LIZ-1 to 20 metres.	Support. RNZ sought a note be added to the Light Industrial Zone warning of potential safety risks for structures more than 40m tall, within 1,000m of RNZ's facilities. RNZ notes that 20m structures in this zone do not present a safety risk and, on that basis, RNZ does not oppose the submission.	Accept the submission. FS304.017
Chorus New Zealand Limited, Spark New Zealand Trading Limited, Spark TowerCo Limited, Vodafone New Zealand Limited (Submitter 282)				
028	Infrastructure section	The submitter seeks that this section allow for temporary infrastructure activities as a permitted activity over a 12 month period. The submitter notes that such activities may need to be deployed during emergencies to continue to provide services.	Support.	Accept the submission. FS304.018

