

SUBMISSION ON THE DRAFT NATIONAL PLANNING STANDARDS

To Ministry for the Environment (MfE)

Name of submitter: Radio New Zealand Limited (RNZ)

Introduction

- 1 RNZ welcomes the opportunity to submit on MfE's Draft National Planning Standards (the *Planning Standards*).
- 2 RNZ is interested in all of the provisions in the Planning Standards. Without limitation, the specific provisions of the Planning Standards that RNZ's submission relates to are:
 - 2.1 S-ASM: Draft Area Specific Matters Standard;
 - 2.2 F-2: Draft Mapping Standard;
 - 2.3 CM-1: Draft Definitions Standard; and
 - 2.4 CM-2: Draft Noise and Metrics Standard.
- 3 RNZ does not wish to be formally heard in support of the submission but would welcome the opportunity to discuss the matters set as a part of MfE's wider consultation process.
- 4 RNZ is a Crown entity established under the Radio New Zealand Act 1995 and is also a Network Utility Operator as defined in section 166 of the Resource Management Act 1991 (*RMA*).
- 5 RNZ owns and operates radio transmission facilities across New Zealand, providing news and information to the public. RNZ broadcasts three national networks: RNZ National, RNZ Concert and the AM network, which relays Parliamentary proceedings.
- 6 RNZ is also designated as a Lifeline Utility under the Civil Defence Emergency Management Act 2002 and performs a civil defence role, providing communication during natural disasters. RNZ is required to function to the fullest possible extent during and after an emergency (although this may be at a reduced level).¹
- 7 It is therefore important that the continued operation, maintenance and improvement of RNZ's national transmission network can occur unimpeded and it is appropriate that the Planning Standards recognise and provide for RNZ's activities.

¹ Civil Defence Emergency Management Act 2002, section 60(a).

Summary of RNZ's position

- 8 RNZ is generally supportive of the rationale behind the Planning Standards, but is conscious that the Planning Standards will need to provide adequately for the continued operation and maintenance of RNZ's facilities, as discussed above.
- 9 The Planning Standards are likely to have major and wide ranging implications for all planning documents in New Zealand going forward. RNZ considers it important to be a part of this process to ensure its interests are acknowledged and catered for in the Planning Standards.
- 10 RNZ spends a significant amount of time and resources ensuring that its interests are recognised and generally provided for in all relevant District Plans (having facilities spread across New Zealand) and some Regional Plans. RNZ seeks to ensure that this progress is not inadvertently undone through the Planning Standards.

S-ASM: DRAFT AREA SPECIFIC MATTERS STANDARD

Zone Chapters: S-ZONES

- 11 RNZ supports the inclusion of a standardised set of zones and considers it will provide greater consistency for New Zealand planning documents, as well as increasing efficiency for plan users.
- 12 RNZ is concerned, however, about the process that will be followed in relation to establishing substantive rules for each zone in the Planning Standards.
- 13 The content of these rules will be of significant interest to RNZ who is primarily concerned in the continuing operation of its facilities without impediment from reverse sensitivity issues arising from newly established activities.
- 14 It would be extremely expensive and difficult for RNZ to relocate its transmitter facilities to mitigate reverse sensitivity effects and therefore any substantive rules must include appropriate reverse sensitivity policies, objectives and rules.
- 15 RNZ intends on engaging in consultation with MfE in any such process that may arise in the future.

F-2: DRAFT MAPPING STANDARD

- 16 RNZ is generally supportive of the mapping standards as set out in this chapter and considers these will improve consistency between planning documents, making them more user friendly for plan users.
- 17 However, RNZ considers that some of the zone colours are largely indistinguishable from one another. This would make it difficult for plan users, including RNZ, to determine which zone and rules applies to certain activities.
- 18 RNZ recommends that the some of the colours contained in "Table 32: Zone colour palette table" be amended to be more distinguishable from one another. The zones which colours RNZ consider too similar are as follows:

18.1 Low-density residential and medium density residential; and

18.2 Rural residential, rural settlement and local commercial.

19 RNZ's feedback dated 28 July 2017 supported MfE's suggestion that network utilities could be controlled using overlays, provided that associated policies and rules took into account the points in paragraph 5.7 and 5.8 of RNZ's feedback. Although a network utilities overlay was not included in the Planning Standards, RNZ would still support a Network Utility Overlay (with the appropriate substantive content) in any subsequent sets of Planning Standards.

CM-1: DRAFT DEFINITIONS STANDARD

20 RNZ is generally supportive of the definitions proposed in the Planning Standards. In particular, RNZ supports the definitions for "infrastructure," "network utility operator," and "reverse sensitivity."

21 RNZ submits that, due to the wide reaching implications the Planning Standards are likely to have in all planning documents, it is difficult to say at this stage whether all of the definitions are adequate and/or whether there is a need to include more definitions.

22 The impact of the definitions determined at this stage can obviously not be fully appreciated; it is only after substantive rules are determined that this will occur. RNZ recommends that submitters are given a chance to make a further submission on definitions at a later stage.

CM-2: DRAFT NOISE AND VIBRATION METRICS STANDARD

23 Many of RNZ's sites are subject to noise limits measured using the New Zealand Standards.

24 RNZ is neutral at this stage on the inclusion of the various standards identified in "Table 30: Acoustic New Zealand Standards referenced." However, RNZ would oppose the inclusion of other standards without submitters first being given a proper opportunity to submit.

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



Ben Williams
Partner

17 August 2018

(A signature is not required if you make your submission by electronic means)

Address for service of submitter:

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Note to person making submission

If you are making a submission to the Environmental Protection Authority, you should use form 16B. If you are a person who could gain an advantage in trade competition through this submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act.