

**FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO,  
SUBMISSION ON NOTIFIED PROPOSED POLICY STATEMENT OR PLAN,  
CHANGE OR VARIATION**

*Clause 8 of Schedule 1, Resource Management Act 1991*

**To** Porirua District Council

Name of person making further submission: **Radio New Zealand Limited (RNZ)**

- 1 This is a further submission on submissions on the proposed Porirua District Plan (*Proposed Plan*).
- 2 RNZ is a person who has an interest in the Proposed Plan that is greater than the interest of the public generally. RNZ made an original submission on the Proposed Plan.
- 3 If others make a similar submission, RNZ will consider presenting a joint case with them at a hearing.
- 4 RNZ's further submissions are set out in **Annexure 1**.

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



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Partner  
11 May 2021

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**ANNEXURE 1: FURTHER SUBMISSIONS**

Submitter name	Submission point	Plan reference	Decision requested by submitter	RNZ support/oppose	Reason for RNZ's support/oppose	Decision sought by RNZ
<b>General</b>						
Kāinga Ora – Homes and Communities	81.940	How the plan works	Amendments are sought throughout the PDP to remove reference to 'avoiding' such activities, in favour of the term 'discourage', or inclusion of qualifying statements.	Oppose.	Reverse sensitivity effects on network utilities and other important infrastructure needs to be avoided, not merely 'discouraged.'	Reject.
Chrissie Areora	88.2	Whitireia Park	All of Whitireia Park must be protected from inappropriate subdivision, use and development.	Support.	RNZ agrees that Whitireia Park (including Owhiti Park) must be protected from inappropriate subdivision, use and development.	Adopt relief including for Owhiti Park.
Tatiana Areora	87.1					
Gay Ojaun	105.1					
Robert Hughes	80.1					
Lesley Wilson	3.1					
Melissa Radford	127.1					
Sharon Hilling	129.1					
Zachariah Paraone Wi-Neera	131.1					
Tina Watson	132.1					

Submitter name	Submission point	Plan reference	Decision requested by submitter	RNZ support/oppose	Reason for RNZ's support/oppose	Decision sought by RNZ
Nikita Howe	133.1					
Rebecca Cray	128.1					
Emma Weston	142.1					
Whitireia Park Restoration Group	150.1					
Geoff Marshall	161.2					
Miriam Freeman-Plume	166.1					
Robyn Smith	168.1					
David Nicholson	171.1					
Friends of Taupo Swamp & Catchment Inc	178.1					
Donna Lee FordTuveve	197.1					
Josh Twaddle	206.1					
Thomas Graham	208.1					

Submitter name	Submission point	Plan reference	Decision requested by submitter	RNZ support/oppose	Reason for RNZ's support/oppose	Decision sought by RNZ
Andrew Brunton	221.1					
Paula Birnie	236.1					
Fraser Ebbett	243.1					
Edmund Stephen-Smith	245.1					
Nathan Cottle	257.1					
Yasemin Ileana Kavas	268.1					
Anita Hilliam	269.1					
Adibah Saad	270.1					
Titahi Bay Community Group and Pestfree Titahi Bay	94.7	Whitireia Park	Whitireia Park in its entirety is protected for its Natural Environment Values and Historical and Cultural Values.	Support.	RNZ supports this submission, provided there is no impact on RNZ's facilities and operations. Preserving the natural environment and cultural values will restrain development that may not be compatible with RNZ operations.	Adopt.
Nathan Cottle	257.9	General	The land is of cultural significance to Maori. <ul style="list-style-type: none"> <li>• Access to Mt Whitireia could be compromised through the building of</li> </ul>	Oppose.	While RNZ supports preserving access and sites of cultural values, the District Plan should not be used to impose restrictions on the sale of	Reject.

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			<p>houses.</p> <ul style="list-style-type: none"> <li>Sites of significance like ancient burial grounds, kumara fields, settlements, cooking areas could be destroyed.</li> <li>There is an opportunity to the right thing and give the land back to the Maori people.</li> </ul> <p>Stop the sale of the RNZ land.</p>		land. This must be addressed through other processes.	
<b>Planning maps</b>						
Tatiana Areora	87.2	Zoning	All land in Whitireia Park continues to be zoned Open Space.	Support.	RNZ considers Open Space Zone the appropriate zone for Whitireia Park.	Adopt.
Chrissie Areora	88.3					
Gay Ojaun	105.2					
Titahi Bay Community Group and Pestfree Titahi Bay	94.4					
Rebecca Cray	128.2					
Nikita Howe	133.2					
Tina Watson	132.2					

Submitter name	Submission point	Plan reference	Decision requested by submitter	RNZ support/oppose	Reason for RNZ's support/oppose	Decision sought by RNZ
Zachariah Paraone Wi-Neera	131.2					
Sharon Hilling	129.2					
Melissa Radford	127.2					
Lesley Wilson	3.2					
Robert Hughes	80.2					
Yasemin leana Kavas	268.2					
Nick Hartley	256.1					
Nathan Cottle	257.2					
Edmund Stephen- Smith	245.2					
Fraser Ebbett	243.2					
Paula Birnie	236.2					
Luke Davia	226.1					
Andrew Brunton	221.2					
	208.2					

Submitter name	Submission point	Plan reference	Decision requested by submitter	RNZ support/oppose	Reason for RNZ's support/oppose	Decision sought by RNZ
Thomas Graham	206.2					
Josh Twaddle	197.2					
Donna Lee Ford-Tuveve	178.2					
Friends of Taupo Swamp & Catchment Inc	171.2					
David Nicholson	168.97					
Robyn Smith	166.2					
Miriam Freeman-Plume	161.3					
Geoff Marshall	150.2					
Whitireia Park Restoration Group	142.2					
Emma Weston	270.2					
Adibah Saad	269.2					
Anita Hilliam						

Submitter name	Submission point	Plan reference	Decision requested by submitter	RNZ support/oppose	Reason for RNZ's support/oppose	Decision sought by RNZ
Kāinga Ora – Homes and Communities	81.18	Zoning	Rezone or extend the Medium Density Residential Zone as shown in Appendix 3 to submission.	Oppose.	RNZ is opposed to any increased intensification in close proximity to its facilities. It is important that network utilities are protected from adverse sensitivity effects. These effects are likely to increase as more people live in proximity to significant infrastructure.	Reject.
Titahi Bay Community Group and Pestfree Titahi Bay	94.4	Zoning	Keep the entire Whitieria Park area, including Radio New Zealand land Open Space.	Support.	RNZ considers Open Space Zone the appropriate zone for Whitireia Park.	Adopt.
Te Āhuru Mōwai	265.2	Zoning	Amend to extend the Medium Density Residential Zone to include Elsdon Residential and the entire areas of Titahi Bay Residential.	Oppose.	RNZ is opposed to any increased intensification in close proximity to its facilities. It is important that network utilities are protected from adverse sensitivity effects. These effects are likely to increase as more people live in proximity to significant infrastructure.	Reject.
Luke Davia	226.1	Zoning	The totality of Whitireia Park should continue to be classified as "Open Space", and protected from all subdivision and development—with no exceptions.	Support.	RNZ considers Open Space Zone the appropriate zone for Whitireia Park.	Adopt.



Submitter name	Submission point	Plan reference	Decision requested by submitter	RNZ support/oppose	Reason for RNZ's support/oppose	Decision sought by RNZ
Geoff Marshall	161.1	Zoning	That the District Plan protects the whole of Whitireia Park as a Regional Park zoned Open Space, and does not permit parts of the park to be available for residential development.	Support.	RNZ considers Open Space Zone the appropriate zone for Whitireia Park.	Adopt.
<b>Definitions</b>						
Wellington Electricity Lines Limited	85.5	Maintenance and repair	Amend the definition as below: means any work, <u>replacement</u> , or activity necessary to continue the operation and / or functioning of existing infrastructure. It does not include upgrading	Support.	RNZ considers maintenance and repair sensibly includes replacement of parts of existing infrastructure.	Adopt.
Waka Kotahi NZ Transport Agency	82.22	Reverse sensitivity	Replace the definition of "Reverse Sensitivity" with the following:  <del>"means the vulnerability of an existing lawfully established activity to other activities in the vicinity which are sensitive to adverse environmental effects that may be generated by such existing activity, thereby creating the potential for the operation of such existing activity to be constrained."</del>	Support.	RNZ would support this definition of 'reverse sensitivity'.	Adopt.

Submitter name	Submission point	Plan reference	Decision requested by submitter	RNZ support/oppose	Reason for RNZ's support/oppose	Decision sought by RNZ
			<p><u>"has the same meaning as reverse sensitivity in section 2 of the RMA: means the potential for the operation of an existing lawfully established activity to be compromised, constrained, or curtailed by the more recent establishment or alteration of another activity which may be sensitive to the actual, potential or perceived adverse environmental effects generated by an existing activity."</u></p>			
<p>Spark New Zealand Trading Limited, Chorus New Zealand Limited, Vodafone New Zealand Limited</p>	<p>51.13</p>	<p>Trenching</p>	<p>"means the excavation of trenches for underground infrastructure, including the Three Waters Network, <u>telecommunications and radio</u> communications, electricity and gas transmission and distribution, and any other network utilities."</p>	<p>Support.</p>	<p>RNZ supports the inclusion of radio communications in this definition.</p>	<p>Adopt.</p>
<p>Powerco Limited</p>	<p>83.13</p>	<p>Upgrading</p>	<p>Amend the definition of upgrading as follows:</p> <p>As it applies to infrastructure, means the improvement, <u>relocation, replacement,</u> or increase in carrying capacity, operational efficiency, <u>size, pressure, security</u> or safety of</p>	<p>Support.</p>	<p>RNZ supports the proposed relief and considers it appropriate.</p>	<p>Adopt.</p>

Submitter name	Submission point	Plan reference	Decision requested by submitter	RNZ support/oppose	Reason for RNZ's support/oppose	Decision sought by RNZ
			existing infrastructure, but excludes maintenance and repair			
Royal Forest and Bird Protection Society	225.77	Upgrading	Amend the definition as follows:  As it applies to infrastructure, means the improvement or increase in carrying capacity, operational efficiency, security or safety of existing infrastructure, <u>provided that the effects of the activity are the same or similar in character, intensity and scale as the existing structure and activity, and does not increase footprint of the infrastructure.</u> <u>'Upgrade'</u> , but excludes maintenance and repair	Oppose.	RNZ opposes the relief sought. Any limits on the ability to upgrade infrastructure with reference to effects are more appropriately dealt with in rules, not as part of the definition. RNZ prefers the definition as notified or as sought by Powerco Limited above.	Reject.
<b>INF – Infrastructure</b>						
Waka Kotahi NZ Transport Agency	82.297	General.	Amendments to the infrastructure chapter to ensure the ongoing operation and functional needs of regionally significant infrastructure are not compromised.	Support.	RNZ supports the further protection of regionally significant infrastructure.	Adopt.
Royal Forest and Bird Protection Society	225.31	New provision	Separate the provisions for RSI from other infrastructure. Consider separate chapters.	Support.	RNZ would not object to this relief.	Support.

Submitter name	Submission point	Plan reference	Decision requested by submitter	RNZ support/oppose	Reason for RNZ's support/oppose	Decision sought by RNZ
Kāinga Ora – Homes and Communities	81.243	INF-02	Amend: The function and operation of Regionally Significant Infrastructure is <del>protected</del> <u>not compromised</u> from the adverse effects, <del>including reverse sensitivity effects</del> , of subdivision, use and development.	Oppose.	RNZ does not consider this proposed wording provides enough protection for regionally significant infrastructure. It is important such infrastructure is protected from reverse sensitivity effects.	Reject.
Spark New Zealand Trading Limited, Chorus New Zealand Limited, Vodafone New Zealand Limited	51.35	INF-05	Amend objective as follows: INF-05 Providing for infrastructure  Infrastructure provides benefits to people and communities and is established, operated, maintained and repaired, and upgraded efficiently, securely and sustainably, while the adverse effects of infrastructure are avoided, remedied or mitigated, <u>while recognising the functional need and operational need of infrastructure.</u> <del>including effects on:</del> 1. The anticipated character and amenity values of the relevant zone; 2. The identified values and qualities of any Overlay; and 3. The change in risk to people's lives and damage to adjacent property and other infrastructure from natural hazards	Support.	RNZ considers it appropriate to recognise the functional and operational needs of infrastructure in this objective.	Adopt.
Powerco Limited	83.31	INF-P4	Amend policy INF - P4 as follows:	Support.	RNZ supports the inclusion of the words "where practicable" as	Adopt.

Submitter name	Submission point	Plan reference	Decision requested by submitter	RNZ support/oppose	Reason for RNZ's support/oppose	Decision sought by RNZ
			<p>Enable new infrastructure and the maintenance and repair, upgrading and removal of existing infrastructure, including earthworks, that: 1. Is of a form, location and scale that minimises adverse effects on the environment <u>where practicable</u>; 2. Is compatible with the anticipated character and amenity values of the zone in which the infrastructure is located; and 3. For any maintenance and repair, or removal of existing infrastructure in any Overlay, it is of a nature and scale that does not adversely impact <u>where practicable</u> on the identified values and characteristics of the Overlay that it is located within.</p>		<p>recognising that infrastructure may have a functional or operational need to be of a certain form, location and scale.</p>	
Waka Kotahi NZ Transport Agency	82.44	INF-P4	<p>Amend provision: "Enable new infrastructure and the maintenance and repair, upgrading and removal of existing infrastructure, including earthworks, that: 1. Is of a form, location and scale that <del>minimises</del> <u>mitigates</u> adverse effects on the environment; 2. <u>For any new infrastructure</u>, it is compatible with the anticipated character and amenity</p>	Support.	RNZ considers these amendments to this policy appropriate.	Adopt.

Submitter name	Submission point	Plan reference	Decision requested by submitter	RNZ support/oppose	Reason for RNZ's support/oppose	Decision sought by RNZ
			values of the zone in which the infrastructure is located; and [...]"			
Spark New Zealand Trading Limited, Chorus New Zealand Limited, Vodafone New Zealand Limited	51.54	INF-P4	Amend the policy as follows: INF-P4 Appropriate infrastructure Enable new infrastructure and the maintenance and repair, upgrading and removal of existing infrastructure, including earthworks, that: 1. Is of a form, location and scale that minimises adverse effects on the environment; 2. <del>Is compatible with the anticipated character and amenity values of the zone in which the infrastructure is located; and</del> 3. For any maintenance and repair, or removal of existing infrastructure in any Overlay, it is of a nature and scale that does not adversely impact on the identified values and characteristics of the Overlay that it is located within.	Support.	RNZ would support this amendment to this policy.	Adopt.
Waka Kotahi NZ Transport Agency	82.45	INF-P5	Amend provision: [...] 4. Requiring sensitive activities to be located and designed so that potential adverse effects of <del>and on</del> the Rail Corridor and State Highways are avoided, remedied or mitigated. [...] 6. Considering any potential adverse effects of subdivision, use and	Support.	RNZ considers it appropriate this policy includes the use and development of a site and that it is appropriate this policy extend to sites also located near regionally significant infrastructure.	Adopt.

Submitter name	Submission point	Plan reference	Decision requested by submitter	RNZ support/oppose	Reason for RNZ's support/oppose	Decision sought by RNZ
			<p><u>development</u> of a site that contains or is adjacent to <u>or located near</u>, any Regionally Significant Infrastructure other than the National Grid, including: [...] 7. Requiring subdivision, <u>use and development</u> of a site that contains or is adjacent to any Regionally Significant Infrastructure other than the National Grid to be designed to avoid or mitigate any adverse effects on access to, and the safe and efficient operation and maintenance and repair of, that infrastructure. "<u>8. Require developers to fund the upgrade of Regionally Significant Infrastructure that is required as a result of subdivision, use and development.</u>"</p>			
Kāinga Ora – Homes and Communities	81.251	INF-P5	Delete entire policy.	Oppose.	RNZ considers that the policy must remain in order to protect regionally significant infrastructure from inappropriate subdivision and sensitive activities. It is important such activities, and their associated adverse reverse sensitivity effects, are avoided near such infrastructure.	Reject.

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Waka Kotahi NZ Transport Agency	82.46	INF-P8	Amend provision: "3. Any adverse effects on amenity values are <del>minimised</del> <u>mitigated</u> , taking into account: a. The bulk, height, size, colour, reflectivity of the infrastructure; b. Any proposed associated earthworks; c. The time, duration or frequency of any adverse effects; and d. Any proposed mitigation measures; [...] 5. Any adverse effects on the natural character and amenity of water bodies, the coast and riparian margins and coastal margins are <del>minimised</del> <u>mitigated</u> ; [...] 7. Any adverse effects on any values and qualities of any adjacent Overlays are <del>minimised</del> <u>mitigated</u> ; [...] 9. Any adverse cumulative effects are <del>minimised</del> <u>mitigated</u> ."	Support.	RNZ considers it more appropriate that such activities are mitigated.	Adopt.
Spark New Zealand Trading Limited, Chorus New Zealand Limited, Vodafone New Zealand Limited	51.33	Note	Amend as follows:  [...]  <del>Note: Noise from backup emergency generators at Radio New Zealand's Titahi Bay facilities is exempt from the noise limits in the Noise chapter. All other infrastructure must comply</del>	Oppose	RNZ opposes the removal of this exemption. The general exemption in the Noise chapter would only apply to some RNZ activities and is not an equivalent substitute for this exemption.	Reject the deletion of the note referring to RNZ's backup emergency generators.



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			with the noise rules for the underlying zone.			
<b>Noise</b>						
Spark New Zealand Trading Limited, Chorus New Zealand Limited, Vodafone New Zealand Limited	51.44	Exemptions	Amend as follows:  The following are all exempt from the rules and standards in this chapter: [...] 5. The use of generators and mobile equipment (including vehicles) for emergency purposes, including testing and maintenance not exceeding 48 hours in duration, where they are operated by emergency services or lifeline utilities, for <u>load shedding purposes</u> , or for the continuation of radiocommunication broadcasts from Radio New Zealand's Titahi Bay facilities;	Support	RNZ supports adding the reference to load shedding.	Adopt
Waka Kotahi NZ Transport Agency	82.167	NOISE-O2	Retain as notified.	Support.	RNZ supports this objective as notified.	Adopt.
KiwiRail Holdings Limited (KiwiRail)	86.58					

Submitter name	Submission point	Plan reference	Decision requested by submitter	RNZ support/oppose	Reason for RNZ's support/oppose	Decision sought by RNZ
<b>Open Space Zone</b>						
Transpower New Zealand Ltd	60.111	OSZ-P5	Amend Policy OSZ-P5 as follows: OSZ-P5 Inappropriate use and development Avoid use and development that is incompatible with the purpose, character and amenity values of the Open Space Zone, unless there is a functional need <u>or operational need</u> to operate on the site. And Any consequential amendments.	Support.	RNZ supports provision for both functional and operational need.	Adopt.
Anita Halliam	269.3	Standards – Whitireia Park	The Open Space provisions do not limit the number of buildings – any number is possible so long as each is less than 50m2 and the combined coverage is no more than 5 percent. Under the permitted standard relating to site coverage and floor area, up to 520 buildings could be built on the Radio New Zealand land. This would be contrary to the objective OSZ-02 'a low level of development and built form with few structures to support passive and active community activities'	Support in part.	RNZ agrees that development on Whitireia Park should be limited. RNZ does not intend to establish further buildings on its site other than in reliance on the purpose set out in designation RNZ-01, and would not oppose amending the bulk and location standards to be consistent with OSZ-02, subject to the details of the standards proposed.	Support subject to details of relied proposed.
Adibah Saad	270.3					
Andrew Brunton	221.3					
Paula Birnie	236.3					
Yasemin Ileana Kavas	268.3					
Nathan Cottle	257.3					
Fraser Ebbett	243.3					
	245.3	Amend the bulk and location standards as they apply to Whitireia				

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Edmund Stephen-Smith	166.3		Park so that they are consistent with OSZ-02.			
Miriam Freeman-Plume	142.3					
Emma Weston	150.3					
Whitireia Park Restoration Group	161.4					
Geoff Marshall	178.3					
Friends of Taupo Swamp & Catchment Inc	171.3					
David Nicholson	206.3					
Josh Twaddle	208.3					
Thomas Graham	197.3					
Donna Lee Ford-Tuveve	127.3					
Melissa Radford	128.3					
Rebecca Cray	129.3					

Submitter name	Submission point	Plan reference	Decision requested by submitter	RNZ support/oppose	Reason for RNZ's support/oppose	Decision sought by RNZ
Sharon Hilling	131.3					
Zachariah Paraone Wi-Neera	132.3					
Tina Watson	133.3					
Nikita Howe	80.3					
Robert Hughes	3.3					
Lesley Wilson	105.3					
Gay Ojaun	88.4					
Chrissie Areora	87.3					
Tatiana Areora						
Spark New Zealand Trading Limited, Chorus New Zealand Limited, Vodafone New Zealand Limited	51.74	OSZ-S1	Amend the standard as follows: Matters of discretion are restricted to: 1. Design and siting of the building or structure; 2. Any shading of, or loss of privacy for, residential units on adjacent sites; 3. Screening, planting, and landscaping of the building or structure; 4. Whether an increase in building or structure height results from a response to natural hazard mitigation; and 5.	Support.	RNZ supports the protection of regionally significant infrastructure from reverse sensitivity effects.	Adopt.

Submitter name	Submission point	Plan reference	Decision requested by submitter	RNZ support/oppose	Reason for RNZ's support/oppose	Decision sought by RNZ
			Whether topographical or other site constraints make compliance with the standard impractical. <u>6. Any reverse sensitivity effects on regionally significant infrastructure</u>			
<b>SCHED9- Outstanding Natural Features and Landscapes</b>						
Nick Hartley	256.2	ONFL003 Whitireia Peninsula	All the RNZ land, except for parts of the golf club and small areas around the radio masts which have been modified, should also be included in the same classification as an 'Outstanding Natural Feature'.	Oppose.	ONFL003 should not apply to land currently occupied, or surrounding, RNZ's facilities. Otherwise, RNZ has no objection to other parts of RNZ's land being subject to the ONFL003.	Reject.
Andrew Brunton	221.4					
Edmund Stephen-Smith	245.4					
Fraser Ebbett	243.4					
Paula Birnie	236.4					
Luke Davia	226.3					
Nathan Cottle	257.4					
Anite Hilliam	269.4					
Yasemin Ileana Kavas	268.4					
Adibah Saad	270.4					

Submitter name	Submission point	Plan reference	Decision requested by submitter	RNZ support/oppose	Reason for RNZ's support/oppose	Decision sought by RNZ
Friends of Taupo Swamp & Catchment Inc	178.4					
David Nicholson						
Donna Lee Ford-Tuveve	171.4					
Thomas Graham	197.4					
Josh Twaddle	208.4					
Whitireia Park Restoration Group	206.4					
Robyn Smith	150.4					
Miriam Freeman-Plume	168.7					
Geoff Marshall	166.4					
Emma Weston	161.5					
Nikita Howe	142.4					
Tina Watson	133.4					

Submitter name	Submission point	Plan reference	Decision requested by submitter	RNZ support/oppose	Reason for RNZ's support/oppose	Decision sought by RNZ
Zachariah Paraone Wi-Neera	132.4					
Rebecca Cray	131.4					
Melissa Radford	128.4					
Sharon Hilling	127.4					
Robert Hughes	129.4					
Lesley Wilson	80.4					
Chrissie Areora	3.4					
Tatiana Areora	88.5					
Gay Ojaun	87.4					
	105.4					
Robyn Smith	168.7 168.113	SCHED9 - Outstanding Natural Features and Landscapes	Amend ONFL003 to include all land owned/administered by GWRC and Radio NZ.  Opposed to any provision of the PDP by way of submissions by others, or by council officer evidence and/or recommendations, that would result	Oppose.	ONFL003 should not apply to land currently occupied, or surrounding, RNZ's facilities. It is unlikely that the requirements of NFL-P1 are met. Natural components in this area are unlikely to dominate over the influence of human activity, as represented by RNZ's transmitting equipment. Otherwise, RNZ has no	Reject.

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		ONFL003 Whitireia Peninsula	in, or attempt to result in, the extent of ONFL003 being reduced.		objection to other parts of RNZ's land being subject to the ONFL003.	