

Before the Independent Hearing Commissioners  
at Far North

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*under:* the Resource Management Act 1991

*in the matter of:* submissions and further submissions in relation to the  
proposed Far North District Plan

Hearing 14 – Urban Zones

*and:* **Radio New Zealand Limited**  
*Submitter 489*

Legal submissions on behalf of Radio New Zealand Limited -  
Hearing 14 – Urban Zones

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Dated: 16 July 2025

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## **LEGAL SUBMISSIONS ON BEHALF OF RADIO NEW ZEALAND LIMITED**

- 1 These legal submissions are provided on behalf of Radio New Zealand Limited (*RNZ*) for Hearing 14 – Urban Zones.
- 2 *RNZ* operates an AM radio transmission facility at facilities at Spains Road, Waipapakauri and SH 12, Ōheaewai (*RNZ's Facilities*). *RNZ's Facilities* are an integral part of *RNZ's* national communication network, broadcast multiple radio programmes and have a critical civil defence role in the Far North District and surrounding areas.
- 3 *RNZ's* submission (489) set out the electromagnetic coupling risk to people associated with tall structures near *RNZ's Facilities*, and the importance of developers of tall structures within 1,000m of the facilities working with *RNZ* to ensure safety.

### **General Residential and Light Industrial zones**

- 4 Parts of the General Residential (*GRZ*) and Light Industrial zones (*LIZ*) at Awanui are within 1,000m of *RNZ* transmitter at Waipapakauri. *RNZ* understands the S42A Officer will be providing an update to her recommendations to include the below note in the GR and LIZ maximum height standards:

*NOTE: If a resource consent application is made for an infringement of GRZ-S1 and the proposed building or structure is:*

- a. *greater than 40 metres in height and within 1,000 metres of the Waipapakauri transmitter at Spains Road, Awanui, Part Lot 4 DP 43276;*

*Then consultation will be required with Radio New Zealand to manage potential adverse electromagnetic coupling effects*

- 5 *RNZ supports* the recommendation to include this note in the GRZ and LIZ provisions, which is consistent with the recommendation of earlier S42A Officers for other zones. The larger height threshold is consistent with *RNZ's* submission and appropriate given the greater distance of the GRZ and LIZ from *RNZ's* submission.
- 6 Counsel appreciates the help of the S42A Officer in this matter.

### **Conclusion**

- 7 As there are no outstanding issues, and no submitter concerns about *RNZ's Facilities*, *RNZ* proposes not to attend Hearing 14, but representatives can be available to assist if that would be useful.

16 July 2025

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Hadleigh Pedler / Ben Williams (Radio New Zealand)