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Dunedin City Council

by email

From: Annabelle Lee
Direct: +64 3 353 0114
Email: annabelle.lee@chapmantripp.com
Partner: Ben Williams
Ref: 042271958/1866698.2

VARIATION 2 OF THE SECOND GENERATION DUNEDIN CITY DISTRICT PLAN

- 1 As you are aware, Radio New Zealand (RNZ) is a further submitter (*FS199.1*) on Variation 2 of the Second Generation Dunedin City District Plan.
- 2 This letter responds to the Dunedin City Council Officer's Section 42A Report dated 15 July 2022 (the *Officer's Report*) and the hearing presentation by Ms Sally Stewart on 22 August 2022 for the proposed rezoning at 750 Highcliff Road (the *Proposed Rezoning*).
- 3 We ask that this letter please be provided to the Greenfield Rezoning Hearings Panel (the *Panel*).

RNZ's Submission and Officer's Report Recommendations

- 4 It is important that the continued operation, maintenance and improvement of RNZ's national transmission network can occur unimpeded, including RNZ's Facilities at Highcliff Road (*RNZ's Facilities*).
- 5 RNZ's primary concern is that subdivision and development in proximity to its transmitter sites could lead to reverse sensitivity effects. Such reverse sensitivity effects on RNZ's existing transmission facilities can undermine the operation of those facilities. While the land around RNZ's Facilities is presently undeveloped, RNZ has had experience of rural facilities being gradually surrounded by residential developments. There is already a small cluster of nearby residences, and any intensification of development increases the risk of problems.
- 6 In its submission, RNZ opposed the proposed rezoning at 750 Highcliff Road and sought that it be disallowed. The Officer's Report¹ supported RNZ's submission that there is a significant potential for reverse sensitivity effects, and observed that it conflicts with policy direction. The Officer considered the Proposed Rezoning inappropriate and recommended that it remain Rural zoning.
- 7 The Officer also emphasised a number of other matters which make 750 Highcliff Road unsuitable for rezoning, including Natural Landscape Overlays and disconnect from existing residential development and public infrastructure.

¹ At 5.4.9, pages 255 to 257.



8 RNZ fully supports the Officer's Report, for the reasons set out in that document.

RNZ's Position

9 Mr Christopher Stewart and Ms Allison Stewart (the *Submitters*) requested that 750 Highcliff Road be rezoned from Rural Peninsula Coast to General Residential. We understand that the Submitters were represented by Ms Sally Stewart at Hearing 4 on 22 August 2022, and that Ms Stewart sought rezoning to Large Lot Residential.

10 RNZ oppose the Proposed Rezoning, regardless of which residential zoning is ultimately sought by the Submitters. 750 Highcliff Road is located right in the middle of the two sites that make up RNZ's Facilities. As such, the rezoning (and ultimately the development) of this site to allow residential use will very likely result in significant adverse effects on RNZ's operations at this facility.

11 In addition, there are underground transmission feeder and power cables which run under 750 Highcliff Road and are covered by an easement. RNZ remain concerned that any residential development would compromise its ability to operate and maintain that infrastructure.

Conclusion

12 RNZ reiterates its opposition to the proposed rezoning at 750 Highcliff Road. RNZ seek that the Panel adopt the Section 42A Officer's recommendations and disallow the Proposed Rezoning, for reasons contained in RNZ's original submission and set out in this letter. The reasons for RNZ's opposition are relevant and important regardless of the particular residential zoning now sought by the Submitters.

13 We are happy to answer any further questions from the Panel.

Yours faithfully

Annabelle Lee

Solicitor