12 August 2025

Space Operations New Zealand Limited
C/- Alex Dunn
Wanaka Office
Level 1, IT House
1 Umbers Street
Three Parks
Wānaka 9305

Dear Alex,

NOTICE OF REQUIREMENT FOR SPACE OPERATIONS NEW ZEALAND LIMITED TO DESIGNATE AIRSPACE AND LAND SURROUNDING THE SATELLITE GROUND STATION AT 721 AND 781 COLYER ROAD, INVERCARGILL, MIC-2025-20.

The Council received your Notice of Requirement and Restrictive Height Plan on 4 August 2025.

As discussed, Council requires further information from you to better understand your Notice of Requirement and any effects it may have on the environment. We are requesting the information under Section 92 of the Resource Management Act 1991 (the Act), pursuant to Section 169(2) of the Act.

- It is unclear how the designation would operate in practice, with only the site at 721 and 781 Colyer Road proposed to be subject to the designation. It is considered that the designation boundary would need to be amended to the outer 3km boundary as shown on the Restrictive Height Plan.

  The effect of locating the boundary of the designation at the 3km boundary would be that this would restrict anyone from carrying out activities on the designated land that will breach the restrictive designation conditions to which the designation relates, without first obtaining the permission of the requiring authority.

  The underlying zone of the District Plan would remain over the land subject to the designation, and would apply to any other activities that are for a purpose different to the designation purpose. Therefore, any activity or works outside the scope of the designation (i.e. works that meet the EMI and height conditions of the designation) will require resource consent as per usual, unless the activity or works are a permitted activity within the underlying zone.

  If you have a different understanding of how the designation would operate, or could provide other similar examples, it would be useful to discuss this further.

- Can you please provide a report from a suitably qualified expert which explains what the Electromagnetic Interference (EMI) restriction will mean for landowners or infrastructure operators in lay terms? It is unclear what activities would be prevented from occurring on land within the 2km radius subject to the EMI restriction. What impact would this restriction have on landowners within the 2km radius, and what activities would be

restricted, for example telemetry of resource consent data, use of personal locator beacons, domestic scale satellite dishes? Is there any existing infrastructure within this radius which would be impacted, for example cell towers, high voltage transmission lines or substations?

It may be necessary to amend the designation so that the activities that are restricted are set out in the designation, to make it clear to plan users.

- The document provided in Appendix 2 of the application does not explicitly mention the Awarua Ground Station or define it as one of three protection zones allocated for space research. The document appears to provide a general overview of frequency allocations and usage in New Zealand, including allocations for space research, but it does not specify particular locations or protection zones for space research activities. Is there another decision document that is missing from the application? (Referred to as the RSM decision throughout the application).

- The application mentions the Radio Regulations – can you please provide a copy of this document, and an explanation of the legal status of the document in NZ and how it relates to this application? The quote provided at page 13 of the application is not referenced and it is unclear what obligations are placed on Councils to ensure these regulations are enforced.

- Please provide details of any consultation that has been undertaken. As the airspace and land designation will place restrictions on landowners within the 2km and 3km radius, it is anticipated that the NOR would be notified to all landowners and any other affected parties, such as infrastructure providers. It also appears that the 3km designation boundary would overlap with existing designations for the state highway and railway corridor, therefore consultation should be undertaken with the Requiring Authorities for these designations to ascertain which designation would be the primary and secondary designation.

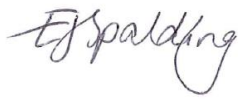
  Please note, a full assessment of affected parties will be undertaken once the scope and effect of the designation are more fully understood.

Under Section 92A you are required to undertake one of the following options within 15 working days of the date of this letter:

1) Provide the requested information
2) Give written notice to the Council that you will provide the requested information
3) Give written notice to the Council that you refuse to provide the requested information.

For further enquiries please contact me on 027 696 1009 or email me emma.spalding@taylorplanning.co.nz.

Yours sincerely



Emma Spalding
CONSULTANT PLANNER