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NZ Transport Agency Waka Kotahi Reference: Application-2025-1371

13 November 2025

Space Operations New Zealand
C/- Alex Dunn
Senior Planner
The Property Group Limited
Level 1, IT House
1 Umbers Street
Three Parks
Wānaka 9305

Sent via: adunn@propertygroup.co.nz

Dear Alex,

**NOTICE OF REQUIREMENT (SECTION 168 – RESOURCE MANAGEMENT ACT 1991 (RMA) APPLICATION FOR NEW DESIGNATION – 721 AND 781 COLYER ROAD, AWARUA – SPACE OPERATIONS NEW ZEALAND LIMITED**

Thank you for your request, dated 2 October 2025, for the written consent of the NZ Transport Agency Waka Kotahi (NZTA) pursuant to s176(1)(b) of the RMA to undertake work within the following NZTA designation:

| | |
|---|---|
| District plan: | Operative Invercargill City District Plan 2019 |
| Designation reference: | Designation 48 |
| Designation purpose: | State Highway |

Your proposal has been considered as follows:

**Proposal**

The following activity is proposed:

- Two Notice of Requirement (NoR) applications to designate land and airspace within a 2 or 3km radius of the boundaries of the subject site (Lot 1 DP 483454 and Lot 1 DP 524692 (Record of Title (RT) 837815), Lot 2 DP 524692 (RT 1134415)), which contains the existing Awarua Ground Satellite Station. The proposed designations are as follows:
  - Airspace Limitation Surface: This designation will restrict the height of objects in the airspace extending outward 3km from the boundaries of the subject site. Specifically, it will prevent any objects from protruding through the 'horizon mask' (a recession plane angle), whereby that 'horizon mask' is measured at a 5-degree angle commencing 2m above any point of the boundary of the existing satellite ground station (being the boundary of Lot 1 DP 483454, Lot 1 DP 524692, and Lot 2 DP 524692). 'Objects' include, but are not limited to, buildings,

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structures, vegetation, cranes, construction machinery or other equipment that may penetrate the airspace limitation surface on a temporary or permanent basis.

- Electromagnetic Interference: This designation seeks to prohibited, unless expressly approved by the applicant, all terrestrial services within a 2km radius, as measured from any point of the boundary of Lot 1 DP 483454, Lot 1 DP 524692, and Lot 2 DP 524692, from producing electromagnetic emissions greater than -154 dBW/MHz at frequencies used for the reception of radio signals from spacecraft at the Awarua Ground Satellite Station as set out in Table of Radio Spectrum Usage in New Zealand (PIB 21) and any subsequent amendments and/or updated to this document..

These activities are described in detail in:

- The report titled 'Space Operations New Zealand Limited Notice of Requirement (Airspace and Land)', prepared by The Property Group Limited and dated 29 July 2025.
- The site plan titled 'Height above ground of the 5 degrees recession angle plane', prepared by Great South Southland Regional Development Agency and dated 4 August 2025 and attached to this letter as **Attachment 1**.

**Assessment**

In assessing the proposed activity, NZTA notes the following:

- At its nearest point, the subject site is located approximately 2.6km southeast of SH1. The section of SH1 adjacent to the subject site is identified as a Regional Road under the NZTA One Network Framework (ONF) and carries an annual average daily traffic (AADT) volume of 3,480 vehicles per day (vpd).
- A section of SH1, measuring approximately 71.5km, will be located within the 3km Airspace Limitation Surface designation. As SH1 is over 2km from the subject site boundaries, no part of SH1 will be located within the proposed Electromagnetic Interference designation.
- No road safety implications in relation to the proposed Airspace Limitation Surface designation have been raised by the regional NZTA Senior Safety Engineer upon review of this proposal.
- The regional NZTA Senior Safety Engineer has also advised that the proposed Airspace Limitation Surface designation will not impact on the physical operation or function along this section of SH1, as roading infrastructure (eg., light poles, road signs) that may be installed along SH1 will be below the 'horizon mask'.
- The consent holder has advised that the proposed Electromagnetic Interference designation is not expected to preclude nor impact on the use of radiowave transmitting devices, including Citizen Band radios, by NZTA staff and contractors that are operating within the vicinity of this designation, as the designation will only apply to the radio frequencies within the Radio Spectrum management's radio band plan used for the reception of space radio signals. On this basis, no concerns have been raised on this matter by the regional NZTA Senior Network Manager.
- Overall, NZTA considers that the proposed Airspace Limitation Surface designation will not prevent or hinder a public work or project or work within Designation 48.
- We note that the applicant has volunteered conditions as part of its application, and NZTA does not oppose those conditions.

**Determination**

Based on the above assessment of the proposed activity, NZTA provides its written consent under section 176(1)(b) of the RMA to the proposed Airspace Limitation Surface designation and Electromagnetic Interference designation. This letter does not constitute consent from NZTA in relation to Section 95E of the RMA (affected party approval) in relation to a resource consent application.

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Please notify NZTA if changes to the application occur.

If you have any queries regarding the above or wish to discuss matters further, please feel free to contact the Environmental Planning team at environmentalplanning@nzta.govt.nz.

Yours sincerely,

Nicole Wallace
Intermediate Planner
Poutiaki Taiao / Environmental Planning, System Design, on behalf of NZ Transport Agency Waka Kotahi.

Enclosed:

- Attachment 1: Airspace Limitation Surface Designation Restrictive Height Plan

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**ATTACHMENT 1: Airspace Limitation Surface Designation Restrictive Height Plan**