

RMA FORM 5

## Submission on publicly notified Proposed

## Porirua District Plan

Clause 6 of the First Schedule, Resource Management Act 1991



To: Porirua City Council

1. Submitter details:

Full Name	Last CRAWFORD	First Craig	
Company/Organisation <i>if applicable</i>			
Contact Person <i>if different</i>			
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	City Porirua	Postcode 5024	
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2. This is a **submission** on the **Proposed District Plan** for Porirua.

3. I could  I could not   
gain an advantage in trade competition through this submission.  
(Please tick relevant box)

If **you could** gain an advantage in trade competition through this submission please complete point four below:

4. I am  I am not   
directly affected by an effect of the subject matter of the submission that:  
(a) adversely affects the environment; and  
(b) does not relate to trade competition or the effects of trade competition.  
(Please tick relevant box if applicable)

Note:

*If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.*

5. I wish  I do not wish   
 To be heard in support of my submission  
*(Please tick relevant box)*

6. I will  I will not   
 Consider presenting a joint case with other submitters, who make a similar submission, at a hearing.  
*(Please tick relevant box)*

Please complete section below (insert additional boxes per provision you are submitting on):

<b>The specific provision of the proposal that my submission relates to:</b>				
Amateur Radio Section 6 (Yagi aerials) Items 4 and 5 - (AR-S6)  <table style="width: 100%; border: none;"> <tr> <td style="border: none; width: 50%; padding: 5px;">Residential Zones</td> <td style="border: none; width: 50%; padding: 5px;">4. The element length must not exceed 2m.</td> </tr> <tr> <td style="border: none;"></td> <td style="border: none; padding: 5px;">5. The boom length must not exceed 2m.</td> </tr> </table>	Residential Zones	4. The element length must not exceed 2m.		5. The boom length must not exceed 2m.
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<b>Do you: Support? Oppose? Amend?</b>				
OPPOSE				
<b>What decision are you seeking from Council?</b>				
<b>What action would you like: Retain? Amend? Add? Delete?</b>				
AMEND maximum dimensions to permit the use of standard beam antennas accepted by almost all other local authorities to allow licenced amateur radio operators in residential zones to provide emergency communications (for example to apply dimensions similar to those proposed for rural zones).				
<b>Reasons:</b>				
<p>The restriction of element length and boom length on “Yagi aerials” in AR-S6 is just one example of the poor quality of the technical advice provided to the Council. However my submission applies to AR-S6 as it is considered the most egregious.</p> <ol style="list-style-type: none"> <li>1. Since 1960 Porirua residents had enjoyed the reception of television on Channel 1 (45.25 MHz). To receive signals from Mt Kaukau most Porirua residents were required to install Yagi-type antennas with elements approximately 3.3 metres wide, and many of these antennas remain installed today. AR-S6 now proposes that amateur radio operators be restricted to Yagi antennas only 2.0 metres wide, less the the size of television antennas that to date have been acceptable for wide-spread use and has not considered detrimental to amenity values.</li> <li>2. The fact that many residential properties have existing Yagi antennas larger than the proposed dimension limits means that such antennas can be retained or replaced as of right. Thus any amateur radio operator that has an existing Yagi antenna (such as for television) would be entitled to replace this existing antenna with a Yagi antenna of similar dimension “for maintenance purposes”, thus bypassing the restraints of AR-S6.</li> <li>3. Larger Yagi antennas for use by amateur radio operators are permitted by most district plans in residential areas (the only known exception is Kapiti District Council). To provide reliable</li> </ol>				

communications (including during emergencies) on high frequency bands amateur radio operators are required to use antennas whose dimensions are specific to the frequencies used. Such antennas can have a boom length of up to 12 metres and element length of up to 22 metres. Both the boom and elements are constructed of thin aluminium tubing, arranged in a flat configuration, providing a low visible profile.

4. Many amateur radio operators are members of the Amateur Radio Emergency Communications (AREC) group which provide communication services to Land SAR (Search and Rescue) and CDEM (Civil Defense and Emergency Management). Both organisations are in the process of improving their service delivery (to bodies such as PCC) and any restrictions to AREC's ability to provide emergency communications could be detrimental to this development and the service able to be provided.
5. Yagi antennas (note that the term "aerials" is an anachronism) refers to beam antennas with one driven element (i.e. fed with radio frequency energy) and one or more parasitic (passive) elements. There are other forms of multi-element antennas that look like a Yagi antenna but which are specifically not a Yagi. This raises the question as to whether PCC can legally deem (and thus exclude) a proposed antenna to be a Yagi where engineering evidence proves that it is not.
6. It appears the Porirua City Council has proposed the exclusion of Yagi antennas on the basis of the Kapiti Council's plan which was the subject of a legal challenge. This could expose the Council to a new legal challenge, based on new evidence.

Please return this form no later than **5pm on Friday 20 November 2020** to:

- Proposed District Plan, Environment and City Planning, Porirua City Council, PO Box 50-218, PORIRUA CITY or
- email [dpreview@pcc.govt.nz](mailto:dpreview@pcc.govt.nz)

Signature of submitter  
(or person authorised  
to sign  
on behalf of submitter):



Date: 17 November 2020

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*A signature is not required if you make  
your submission by electronic means*