

OFFICER'S REPORT FOR:

Independent Hearing Commissioners:

Trevor Robinson

Mark St Clair

Miria Pomare

SUBJECT:

Proposed Porirua District Plan: Amateur Radio

PREPARED BY:

Louise White, Intermediate Policy Planner

REPORT DATED:

3 December 2021

DATE OF HEARING:

8-9, 11, 14-15 February 2022

Executive Summary

1. This report considers submissions received by Porirua City Council (the Council) in relation to the relevant objectives, policies, rules, and definitions of the Proposed Porirua District Plan (PDP) as they apply to the AR – Amateur Radio Chapter. The report outlines recommendations in response to the issues that have emerged from these submissions.
2. There were a number of submissions and further submissions received on Amateur Radio. The majority of submissions received sought greater recognition of amateur radio's contributions in search and rescue and disaster relief, and sought changes to make amateur radio more enabling in the General Rural Zone and Residential Zones. The following are considered to be the key issues in contention in the chapter:
 - General submissions and amendments sought to the introduction of the chapter;
 - Amend Yagi Aerial permitted activity standards for the Residential Zones to match the General Rural Zone standards to recognise the operational requirements of amateur radio configurations; and
 - Amend General Rural Zone permitted activity standards to allow for a greater number of amateur radio installations to reflect the ability of Rural Zone lot sizes to absorb visual amenity effects of installations with a higher number of aerials and support structures.
3. This report addresses each of these key issues, as well as any other issues raised by submissions.
4. I have recommended a minor correction to the PDP provisions based on a minor error identified in one of the submissions. Otherwise, no material changes to the Chapter have been recommended.
5. Having considered all the submissions and reviewed all relevant statutory and non-statutory documents, I recommend that the PDP should be amended as set out in Appendix A of this report.
6. For the reasons set out in the Section 32AA evaluation and included throughout this report, I consider that the proposed objectives and provisions, with the recommended amendments, will be the most appropriate means to:
 - achieve the purpose of the Resource Management Act 1991 (RMA) where it is necessary to revert to Part 2 and otherwise give effect to higher order planning documents, in respect to the proposed objectives; and
 - achieve the relevant objectives of the PDP, in respect to the proposed provisions.

Contents

Executive Summary.....	i
Contents.....	ii
Interpretation	iv
1 Introduction	1
1.1 Purpose.....	1
1.2 Author.....	1
1.3 Supporting Evidence.....	2
1.4 Key Issues in Contention	2
1.5 Procedural Matters.....	2
2 Statutory Considerations	3
2.1 Resource Management Act 1991	3
2.2 Section 32AA.....	3
2.3 Trade Competition.....	4
3 Consideration of Submissions and Further Submissions	5
3.1 Overview.....	5
3.2 General Submissions – Evidence base, s32 analysis, amenity values and history of Amateur Radio.....	6
3.3 Increase Yagi Aerial dimensions for the Residential Zone [AR-S6].....	8
3.4 Increase number of aerials and support structures for the General Rural Zone and include no limit for rope yagi	10
3.5 Definitions	11
3.6 Minor Errors	11
4 Conclusions	13

Appendices

- Appendix A. Recommended Amendments to Amateur Radio Chapter
- Appendix B. Recommended Responses to Submissions and Further Submissions
- Appendix C. Report Author's Qualifications and Experience

List of Tables

Table 1: Abbreviations	iv
Table 2: Abbreviations of Submitters' Names	iv

List of Tables in Appendices

Table B 1: Recommended responses to submissions and further submissions	
---	--

Interpretation

7. Parts A and B of the Officer's reports utilise a number of abbreviations for brevity as set out in Table 1 below:

Table 1: Abbreviations

Abbreviation	Means
the Act / the RMA	Resource Management Act 1991
the Council	Porirua City Council
the Operative Plan/ODP	Operative Porirua District Plan 1999
the Proposed Plan/PDP	Proposed Porirua District Plan 2020
GWRC	Greater Wellington Regional Council
NES	National Environmental Standard
NES-AQ	National Environmental Standards for Air Quality 2004
NES-CS	National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
NES-ETA	National Environmental Standards for Electricity Transmission Activities 2009
NES-FW	National Environmental Standards for Freshwater 2020
NES-MA	National Environmental Standards for Marine Aquaculture 2020
NES-PF	National Environmental Standards for Plantation Forestry 2017
NE-SSDW	National Environmental Standards for Sources of Drinking Water 2007
NES-TF	National Environmental Standards for Telecommunication Facilities 2016
NPS	National Policy Statement
NPS-ET	National Policy Statement on Electricity Transmission 2008
NPS-FM	National Policy Statement for Freshwater Management 2020
NPS-UD	National Policy Statement on Urban Development 2020
NPS-REG	National Policy Statement for Renewable Electricity Generation 2011
NZCPS	New Zealand Coastal Policy Statement 2010
PNRP	Proposed Wellington Natural Resources Plan (Decisions Version) 2019
RPS	Wellington Regional Policy Statement 2013

Table 2: Abbreviations of Submitters' Names

Abbreviation	Means
Dept of Corrections	Ara Poutama Aotearoa the Department of Corrections
DOC	Department of Conservation Te Papa Atawhai
FENZ	Fire and Emergency New Zealand
Foodstuffs	Foodstuffs North Island Limited
Forest and Bird	Royal Forest and Bird Protection Society
GWRC	Greater Wellington Regional Council
Harvey Norman	Harvey Norman Properties (N.Z.) Limited
Heritage NZ	Heritage New Zealand Pouhere Taonga
House Movers Association	House Movers section of the New Zealand Heavy Haulage Association Inc
Kāinga Ora	Kāinga Ora – Homes and Communities
KiwiRail	KiwiRail Holdings Limited

NZART	New Zealand Association of Radio Transmitters
NZDF	New Zealand Defence Force
Oil companies	Z Energy, BP Oil NZ Ltd and Mobil Oil NZ Limited
Oranga Tamariki	Oranga Tamariki – Ministry of Children
QEII	Queen Elizabeth the Second National Trust
RNZ	Radio New Zealand
Survey+Spatial	Survey+Spatial New Zealand (Wellington Branch)
Telco	Spark New Zealand Trading Limited, Chorus New Zealand Limited, Vodafone New Zealand Limited
TBARC	Titahi Bay Amateur Radio Club Inc.
Transpower	Transpower New Zealand Ltd
TROTR	Te Rūnanga o Toa Rangatira
Waka Kotahi	Waka Kotahi NZ Transport Agency
WE	Wellington Electricity Lines Limited
Woolworths	Woolworths New Zealand Limited

In addition, references to submissions includes further submissions, unless otherwise stated.

1 Introduction

1.1 Purpose

8. The purpose of this report is to provide the Hearing Panel with a summary and analysis of the submissions received on the Amateur Radio Chapter and to recommend possible amendments to the PDP in response to those submissions.
9. This report is prepared under section 42A of the RMA. It considers submissions received by the Council in relation to the relevant strategic objectives, objectives, policies, rules, definitions as they apply to the Amateur Radio Chapter in the PDP. The report outlines recommendations in response to the key issues that have emerged from these submissions.
10. This report discusses general issues, the original and further submissions received following notification of the PDP, makes recommendations as to whether or not those submissions should be accepted or rejected, and concludes with a recommendation for changes to the PDP provisions or maps based on the preceding discussion in the report.
11. The recommendations are informed by the evaluation undertaken by the author.
12. This report is provided to assist the Hearings Panel in their role as Independent Commissioners. The Hearings Panel may choose to accept or reject the conclusions and recommendations of this report and may come to different conclusions and make different recommendations, based on the information and evidence provided to them by submitters.
13. This report is intended to be read in conjunction with Officers' Report: Part A – Overview which contains factual background information, statutory context and administrative matters pertaining to the district plan review and PDP.

1.2 Author

14. My name is Louise Evon White. My qualifications and experience are set out in Appendix C of this report.
15. My role in preparing this report is that of an expert planner.
16. I was involved in the preparation of the PDP and authored the Section 32 Evaluation Reports for the Signs Chapter and Hospital Zone Chapter.
17. Although this is a Council Hearing, I have read the Code of Conduct for Expert Witnesses contained in the Practice Note issued by the Environment Court December 2014. I have complied with that Code when preparing my written statement of evidence and I agree to comply with it when I give any oral evidence.
18. The scope of my evidence relates to Amateur Radio. I confirm that the issues addressed in this statement of evidence are within my area of expertise as an expert policy planner.
19. Any data, information, facts, and assumptions I have considered in forming my opinions are set out in the part of the evidence in which I express my opinions. Where I have set out opinions in my evidence, I have given reasons for those opinions.

20. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

1.3 Supporting Evidence

21. The expert evidence, literature, legal cases or other material which I have used or relied upon in support of the opinions expressed in this report includes the Environment Court Decision on the appeal lodged by New Zealand Association of Radio Transmitters Incorporated and Kapiti Amateur Radio Society Incorporated on the Kapiti Coast Proposed District Plan – *New Zealand Association of Radio Transmitters Incorporated v Kapiti-Coast District Council [2019]*;

1.4 Key Issues in Contention

22. The Amateur Radio Chapter received four submissions and 12 further submissions. One submission was in full support of the chapter. Other submissions sought changes to the introductory statement for the chapter. Submissions which opposed certain provisions and sought amendments were received on the provisions relating to Yagi Aerials for the Residential Zones and provisions relating to the number of support structures, aerials and the size of amateur radio elements for the General Rural Zone. The submissions opposed to certain provisions sought increases to the size and number of amateur radio installations for the Residential Zones and General Rural Zone.
23. I consider the following to be the key issues in contention in the chapter:
- The standards for Yagi Aerials for the Residential Zones should be the same as for the Rural Zones due to operational requirements.
 - The number of support structures and aerials for the General Rural Zone should be increased to reflect the ability of larger lot sizes to absorb the adverse visual amenity effects.
24. I address each of these key issues in this report, as well as any other issues raised by submissions.

1.5 Procedural Matters

25. At the time of writing this report there has not been any pre-hearing conferences, clause 8AA meetings or expert witness conferencing in relation to submissions on this Amateur Radio Chapter.
26. There have been no pre-hearing reports or Joint Witness Statements to consider when preparing this report.

2 Statutory Considerations

2.1 Resource Management Act 1991

27. The PDP has been prepared in accordance with the RMA and in particular, the requirements of:
- section 74 Matters to be considered by territorial authority; and
 - section 75 Contents of district plans.
28. As set out in the Section 32 Evaluation Report Part 1 - Overview to s32 Evaluation, there are a number of higher order planning documents and strategic plans that provide direction and guidance for the preparation and content of the PDP. These documents are discussed in detail within the Section 32 Evaluation Report Part 2: Amateur Radio. There is further discussion in the Section 32 Evaluation Report Part 1 – Overview to the s32 Evaluation on the approach the Council has taken to giving effect to the NPS-UD and NPS-FM. This is also discussed in the Officer's Report: Part A.

2.2 Section 32AA

29. I have undertaken an evaluation of the recommended amendments to provisions since the initial section 32 evaluation was undertaken in accordance with s32AA. Section 32AA states:

32AA Requirements for undertaking and publishing further evaluations

(1) A further evaluation required under this Act—

(a) is required only for any changes that have been made to, or are proposed for, the proposal since the evaluation report for the proposal was completed (the changes); and

(b) must be undertaken in accordance with section 32(1) to (4); and

(c) must, despite paragraph (b) and section 32(1)(c), be undertaken at a level of detail that corresponds to the scale and significance of the changes; and

(d) must—

(i) be published in an evaluation report that is made available for public inspection at the same time as the approved proposal (in the case of a national policy statement or a New Zealand coastal policy statement or a national planning standard), or the decision on the proposal, is notified; or

(ii) be referred to in the decision-making record in sufficient detail to demonstrate that the further evaluation was undertaken in accordance with this section.

(2) To avoid doubt, an evaluation report does not have to be prepared if a further evaluation is undertaken in accordance with subsection (1)(d)(ii).

30. As there are no changes proposed as a result of submissions, I have not undertaken a 32AA evaluation. The only change proposed is to correct a minor error in the numbering of a matter of discretion in a standard.

2.3 Trade Competition

31. Trade competition is not considered relevant to the Amateur Radio provisions of the PDP.
32. There are no known trade competition issues raised within the submissions.

3 Consideration of Submissions and Further Submissions

3.1 Overview

33. There were 18 submission points and 144 further submission points received on Amateur Radio. There were 17 submissions that sought amendments to the chapter, including amendments to the introduction section to recognise Amateur Radio's importance and history, changes to the Yagi Aerial provisions for the Residential Zones to match the provisions for the Rural Zones and the provisions relating to the number of aerials and support structures for the General Rural Zone to be increased. The 144 further submissions received were all in support of the submission points made by the Titahi Bay Amateur Radio Club Inc. (TBARC) and New Zealand Association of Radio Transmitters (NZART) [224.1 to 224.12]. The further submissions received were pro-forma in nature and are grouped for assessment purposes.

3.1.1 Report Structure

34. Submissions on Amateur Radio raised a number of issues which have been grouped into sub-topics within this report. Some of the submissions are addressed under a number of topic headings based on the topics contained in the submission. I have considered substantive commentary on primary submissions contained in further submissions as part of my consideration of the primary submission(s) to which they relate.
35. In accordance with Clause 10(3) of the First Schedule of the RMA, I have undertaken the following evaluation on both an issues and provisions-based approach, as opposed to a submission by submission approach. I have organised the evaluation in accordance with the layout of chapters of the PDP as notified.
36. This evaluation is generic only and may not contain specific recommendations on each submission point, but instead discusses the issues generally. This approach is consistent with Clause 10(2)(a) of Schedule 1 to the RMA. Specific recommendations on each submission / further submission point are contained in Appendix B.
37. The following evaluation should be read in conjunction with the summaries of submissions and the submissions themselves. Where I agree with the relief sought and the rationale for that relief, I have noted my agreement, and my recommendation is provided in the summary of submission table in Appendix B. Where I have undertaken further evaluation of the relief sought in a submission(s), the evaluation and recommendations are set out in the body of this report. I have provided a marked-up version of the Chapter with recommended amendments in response to submissions as Appendix A.
38. There are no definitions that are specific to this topic that have not already been addressed in Hearing Stream 1.

3.1.2 Format for Consideration of Submissions

39. For each identified topic, I have considered the submissions that are seeking changes to the PDP in the following format:
- Matters raised by submitters;

- Assessment; and
 - Summary of recommendations
40. The recommended amendments to the Amateur Radio chapter as a result of minor errors are set out in in Appendix A of this report where all text changes are shown in a consolidated manner.

3.2 General Submissions – Evidence base, s32 analysis, amenity values and history of Amateur Radio

3.2.1 *Matters raised by submitters*

41. TBARC and NZART submissions [224.2, 224.3, 222.4, 224.5, 224.6, 224.7, 224.8, 224.9, 224.10 and 224.11] seek that amenity values of amateur radio, radio science evidence, the history of amateur radio and amateur radio's contribution to disaster relief communications and search and rescue be recognised in the Amateur Radio chapter. They submit that:
- *Review and update Section 32 Evaluation Report Part 2 - Amateur Radio, Section 5 Resource Management Issues Analysis, Section 5.1 Background, para. 2: "amateur radio in emergencies is not sufficiently advanced".*
 - *Acknowledge the responsibilities of Radio Amateurs in the requirement in the General User Radio Licence to "Prepare for and meet communications needs for disaster relief" in the Proposed Porirua District Plan. Requests to not be unreasonably impeded in fulfilling this requirement.*
 - *The values and benefits of Amateur Radio be recognised by Porirua City.*
 - *Recognise the amenity values of amateur radio in the Proposed Porirua District Plan.*
 - *Acknowledgement is made in the Proposed Porirua District Plan that Amateur Radio has a long history of "Self Regulating".*
 - *Recognise the personal statement of the career of Dr Murray Milner as part of the total response of the Titahi Bay Amateur Radio Club Inc. to the Proposed Porirua District Plan.*
 - *Recognise in the context of the Proposed Porirua District Plan the long and mutual history and relationships of TBARC with PCC and its predecessor.*
 - *Note the history of TV reception in the Wellington Region as an example of "what might have been" had a different Council regulatory environment been in force at that time*
42. All the further submissions support them on the above requests and submit that:
- *Council has correctly identified an unintended fault in the wording of S.32.*
 - *Acknowledge and accept the information provided on AREC in the Proposed Porirua District Plan, and use it to inform decision making.*
 - *Any unreasonable limitation of the use of amateur radio frequencies within the City completely frustrated the intention of International Law and National Law.*
 - *The Amenity Values of amateur radio are objective and tangible. They are also easily verifiable. The only significant Amenity Value AGAINST amateur radio configurations is*

the visual effect, and that is a highly subjective – it depends on who is making the assessment

- *Self regulation reduces the costs of administration of all organisations that become involved – including local Authorities and Government Departments.*
- *There is evidence that when persons with radio amateur licenses relocate, they avoid places that are hostile to ARCs. In due course, cities or districts that discourage technologists from living in their environs, they deplete themselves of a very essential workforce. Technologists would have to travel from out of the area to attend to faults or installations, which can add costs and delays.*
- *Radio Spectrum Management (a department within the Ministry of Business, Innovation and Employment) has devolved large portions of its administrative work to NZART, and in some cases, to individual Radio Amateurs as “Approved Radio Certifiers” (mostly unpaid).*

3.2.2 Assessment

43. It is unclear through the submission exactly what type of relief TBARC and NZART submissions [224.2, 224.3, 224.6 and 224.7] are seeking. Whether it is changes to the introduction section of the chapter or the objectives and policies is unclear and has not been specifically requested. TBARC and NZART [224.1 and 224.12] have requested specific relief in respect to the Yagi Aerial provisions which is addressed in section 3.3 of this report.
44. I disagree with TBARC and NZART submissions [224.2, 224.3, 224.4, 224.5, 224.6, 224.7, 224.8, 224.9, 224.10, 224.11] and the supporting further submissions that the chapter needs to better reflect amenity values of Amateur Radio; that the Section 32 Report needs to be corrected; that I should rely on the evidence provided through their submission; the request that chapter needs to include historical details of Amateur Radio and that the chapter should better reflect Amateur Radio's contributions to search and rescue and emergency response.
45. TBARC and NZART submission focus's heavily on the operational practicalities and benefits of Amateur Radio and the inappropriate and deemed unworkable Yagi Aerial standards for the Residential Zone, where many of their operators reside. TBARC and NZART state that the Amateur Radio Chapter appears to be heavily weighted towards the subjective assessment of the 'loss of visual amenity' with little weight given to the 'amenity values' of Amateur Radio.
46. 'Amenity value' is defined under the RMA and PDP as *those natural or physical qualities and characteristics of an area that contribute to people's appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes*. From an RMA context, amenity values are values attributed to a place/area and not an object or structure, such as an amateur radio installation. Thus, I consider it is not appropriate to reference 'amenity values' of Amateur Radio in the chapter.
47. Although Amateur Radio installations form part of the residential environment, their inclusion should not be at a scale that dominates or overwhelms the residential environment. The rationale for the size and number of aerials and support structures for Amateur Radio is set out in the Amateur Radio s32 evaluation. For example, the proposed provisions are similar to other District Plans in the region such as the Kapiti Coast District Plan that was made fully operative this year.

48. In regards to TBARC and NZART [224.7] – I acknowledge there is some benefit to the community from amateur radio operator assistance during emergencies as cited in the recent Environment Court¹ decision on the Kapiti Coast Proposed District Plan regarding amateur radio appeal. However, it was noted in this case from Kapiti Coast District Council's expert witness Mr van Schalkwyk, Senior Emergency Manager for Kapiti at the Wellington Emergency Management Office (WREMO) that *"while amateur radio operators are an important resource in civil defence emergencies, their radio transmission structures were very unlikely to be required as WREMO was already well equipped with its own primary and backup systems."* Acknowledgment that Amateur Radio provides some benefits to emergency management does not change the s32 report assessment or outcomes and does not influence the conclusions reached in the report.
49. The submitters have not provided any evidence or s32 evaluation that the requested amendments would be more appropriate for achieving the purpose of the RMA with regard to s7(b), s7(c) and s7(f) or how the chapter should be amended to reflect the positive contributions and historical context for Amateur Radio nor how the submitter would like the Chapter to be amended to recognise the 'amenity values' of Amateur Radio or to recognise Amateur Radio's contribution to disaster relief and emergency response. The submitter may wish to address this before or at the hearing.
50. I do not consider any amendments to the PDP are required.

3.2.3 Recommendations

51. I recommend for the reasons given in the assessment, that the submissions from TBARC and NZART [224.2, 224.3, 224.4, 224.5, 224.6, 224.7, 224.8, 224.9, 224.10 and 224.11] be **rejected**.
52. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission

3.3 Increase Yagi Aerial dimensions for the Residential Zone [AR-S6]

3.3.1 Matters raised by submitters

53. TBARC and NZART [224.1 and 224.12] seek that the proposed shorter dimensions of Yagi Aerial element and boom lengths for the Residential Zones be amended, as follows:

Amend the provisions for Yagi aerials in the Residential Zones. Otherwise, supports the provisions for Amateur Radio in the Proposed Porirua District Plan. Short aerial dimensions proposed for Yagi aerials in the Residential Zones are beyond the laws of radio physics and are unworkable for this purpose.

54. Craig Crawford [102.1] seeks that AR-S6 antenna dimensions for residential zones be amended to be similar to those proposed for rural zones summarised as follows:

Porirua residents had enjoyed the reception of television on Channel 1 (45.25 MHz) since 1960. Most Porirua residents were required to install Yagi-type antennas with elements approximately 3.3 metres wide. Many of these antennas remain installed

¹ Decision No. [2019] NZEnvC 039 – New Zealand Association of Radio Transmitters Incorporated v Kapiti Coast District Council.

today. AR-S6 now proposes that amateur radio operators be restricted to Yagi antennas only 2.0 metres wide, less the size of television antennas that to date have been acceptable for wide-spread use and has not considered detrimental to amenity values. Many residential properties have existing Yagi antennas larger than the proposed dimension limits. Such antennas can be retained or replaced as of right. Amateur radio operators that have an existing Yagi antenna would be entitled to replace this existing antenna with a Yagi antenna of similar dimension "for maintenance purposes", bypassing the restraints of AR-S6.

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. Reliable communications (including during emergencies) on high frequency bands requires use of antennas with dimensions specific to the frequencies used. These 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.

3.3.2 Assessment

55. I consider the increase to the Residential Zone Yagi Aerial dimensions to match the Rural Zone dimensions is inappropriate given the different amenity values and character of Residential Zones, and reiterate the rationale provided in the s32 report evaluation for Amateur Radio that:

The provisions allow for exceedances of the underlying zone standards, including for height. As such there may be additional effects generated by amateur radio configurations which would not otherwise be permitted under the zone provisions. However, these provisions have been developed in consideration of the types of structures associated with amateur radio configurations and are therefore more targeted than the relevant underlying zone provisions which address a variety of structures and buildings. As such, the overall environmental costs of the proposed provisions are acceptable.

56. TBARC and NZART [224.1 and 224.12] and Craig Crawford [102.1] have not provided a s32AA assessment that larger yagi aerial booms and elements of the size for the Rural Zones would be suitable for the Residential Zones. Permitting these longer elements is more appropriately assessed on a case by case basis through a resource consent process with consideration to site specific mitigation measures.
57. The PDP permits aerials and support structures at heights that currently exceed the Operative District Plan zone standards for height that would trigger the need for a resource consent for Amateur Radio installations if breached. Thus, the PDP is already more enabling of Amateur Radio. There is an absence of an assessment from TBARC and NZART [224.1 and 224.12] and Craig Crawford [102.1] that the larger yagi elements requested in combination with the more enabling height limits provided under the PDP is appropriate and compatible with the amenity and character of the Residential Zones. The submitter may wish to address this before or at the hearing.
58. I do not consider any amendments to the PDP are required.

3.3.3 Recommendation

59. I recommend for the reasons given in the assessment, that the submissions from TBARC and NZART [224.1 and 224.12] and Craig Crawford [102.1] be **rejected**.
60. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.4 Increase number of aerials and support structures for the General Rural Zone and include no limit for rope yagi

3.4.1 Matters raised by submitters

61. William Arnold [175.1 to 175.4] seeks that the number of aerials and support structures of Amateur Radio in the General Rural Zone are increased, as follows:

Amend AR-S7-1 in the case of the General Rural Zone (GRZ) as follows:

In the case of the GRZ, there must be no more than nine aerials attached to ground mounted structures per site.

Amend AR-S8-3 (the one before Paragraph 4.) as follows:

In the case of the GRZ there must be no more than twelve supporting structures per site with a horizontal diameter less than 120mm.

Amend AR-S5-3 in the case of the General Rural Zone (GRZ) as follows:

The number of dish aerials in the case of the GRZ must not exceed nine per site.

Amend AR-S6-3 in the case of the General Rural Zone (GRZ) as follows:

In the case of the GRZ, there is no limit to the length of a rope Yagi.

In the General Rural Zone, the large amount of space inherent in a 5ha or 40ha block mitigates the impact of multiple aerial structures. This is true irrespective of whether or not they consist of dishes. Hence the increases in the permitted numbers of dish aerials and support structures are warranted.

Where space permits, very long but light-weight Yagi aerials can be constructed for certain VHF bands (50 MHz and 144 MHz) using ropes instead of a boom. These aerials typically use wire elements so have little visual impact.

Rural amateur radio operators sometimes take advantage of highly directional wire aerials known as rhombics. The wire itself is practically invisible from further away than 100m, but such an aerial requires four supports. An operator might require three such antennas for covering different points of the globe, thus needing twelve supports.

62. The submitter cites that the visual impacts are mitigated through larger blocks of 5ha to 40ha and the fact that ropes instead of boom use wire elements with little visual impact.

3.4.2 Assessment

63. I agree with the submitter that rural zoned sites have the capacity to potentially absorb additional aerials and support structures if sited and screened appropriately. However, this type of assessment is more effectively undertaken on a case by case basis through a resource consent process when considering the specific characteristics and topography of a site. The PDP provisions have already been subject to a s32A assessment, and the submitter has not provided such an assessment to support their requested amendments.
64. In my opinion, the size of the site is not the only factor that should be given consideration when determining the number of support elements and aerials that is appropriate but also factors such as the ability of the site to screen these structures from being visible outside the site to help mitigate the cumulative effects of increased structures on the rural character and amenity. There is potential for cumulative effects to occur on the rural character through increased aerials and support structures beyond what is already permitted under the PDP. The submitter may wish to provide additional evidence at the hearing regarding the appropriateness of the additional aerials and support structures in being compatible with the character of the rural zone.
65. I agree with the submitter that rope yagi may be less visible than a boom element. However, the submitter has not provided any information on a suggested diameter of the rope yagi and how this might compare visually to a boom element. The submitter may wish to provide a recommended diameter limit for the rope yagi at the hearing in order for this to be considered as a permitted standard for the General Rural Zone under AR-S6.
66. I do not consider any amendments to the PDP are required.

3.4.3 Recommendation

67. I recommend for the reasons given in the assessment, that the submissions from William Arnold [175.1 to 175.4] be **rejected**.

3.5 Definitions

68. There are no definitions that are specific to this topic that have not already been addressed in Hearing Stream 1.

3.6 Minor Errors

69. I recommend that an amendment be made to the Amateur Radio Chapter to fix a numbering error for AR-S8 which was also requested by submitter William Arnold [175.3]. This amendment

could have been made after PDP was notified through the RMA process to correct minor errors², but I recommend the amendment is made as part of the Hearing Panel's recommendations for completeness and clarity. The amendment is set out below.

AR-S8	Support structures
All zones	<div> <div> <p>1. There must be no more than one supporting structure per site that exceeds 120mm in diameter.</p> <p>3. <u>2.</u> The maximum horizontal diameter of a pole or other supporting structure allowed under AR-S8-1 must not exceed 800mm.</p> <p>3. There must be no more than six supporting structures per site with a horizontal diameter less than 120mm.</p> <p>4. Guy wires must not exceed 10mm in diameter.</p> </div> <div> <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> Any positive effects of the activities; Any adverse effects on the character and amenity values of the surrounding area; Any adverse visual amenity effects on adjoining sites; The location of the structures and any alternative options; The finish of the material used on the structures; and Cumulative effects associated with multiple devices and structures. </div> </div>

² Clause 16 of RMA Schedule 1

4 Conclusions


70. Submissions have been received in support of, and in opposition to the PDP.
71. Having considered all the submissions and reviewed all relevant statutory and non-statutory documents, I recommend that the PDP should be amended to fix minor typological errors as set out in Appendix A of this report.
72. I have not undertaken a Section 32AA evaluation as I have not recommended any amendments to the notified provisions.

Recommendations:

I recommend that:

1. The Hearing Commissioners accept, accept in part, or reject submissions (and associated further submissions) as outlined in Appendix B of this report; and
2. The PDP is amended in accordance with the changes recommended in Appendix A of this report.

Signed:

Name and Title		Signature
Report Author	Louise White	

Appendix A. Recommended Amendments to [Chapter/s]

Where I recommend changes in response to submissions, these are shown as follows:

- Text recommended to be added to the PDP is in red and underlined.
- Text recommended to be deleted from the PDP is in red and ~~struckthrough~~.

AR - Amateur Radio

Amateur radio is a personal recreational and technical activity that encourages experimentation in radio technology and related topics, self-training, and personal communications across wide geographic areas.

Amateur radio operators do not fit within the definition of network utility operators under the RMA and the structures they use are not defined as infrastructure under the RMA. However, their activities involve radio-communication and amateur radio configurations involve masts, aerials and supporting structures similar to some infrastructure.

Amateur radio structures are most commonly located in residential or rural areas, in the backyard of an operator's property, but may also occur in commercial areas. Both the location and size of some configurations means that they may cause adverse effects on the character and amenity values of the surrounding environment.

Objectives

AR- O1 Amateur radio

Amateur radio configurations are able to be efficiently established within the City while avoiding unacceptable adverse effects on the surrounding environment.

Policies

AR- P1 Appropriate amateur radio

Enable amateur radio configurations within the Rural, Residential, and Commercial and Mixed Use Zones, General Industrial Zone, Future Urban Zone, Māori Purpose Zone (Hongoeka), and Special Purpose Zone (BRANZ), where:

1. They are of a size and scale that is compatible with the character and amenity values of the zone; and
2. Any adverse effects on the health and safety of people and communities are avoided, remedied or mitigated.

AR- P2 Potentially inappropriate amateur radio

Only allow amateur radio configurations within Open Space Zone, Sport and Active Recreation Zone or Hospital Zone, and any other zones where it can be demonstrated that:

1. They are not incompatible with the character and amenity values of the zone; and
2. Any adverse effects are avoided, remedied or mitigated.

AR- P3 Inappropriate amateur radio

Avoid amateur radio configurations which have unacceptable adverse effects on the health and safety of people and communities.

Rules

Note: There may be a number of provisions that apply to an activity, building, structure or site. Resource consent may therefore be required under rules in this chapter as well as other chapters. Unless specifically stated in a rule, resource consent is required under each relevant rule. The steps to determine the status of an activity are set out in the General Approach chapter.

The plan provisions in the following chapters also apply to amateur radio configurations and must be complied with, or a resource consent sought for any relevant non-compliance:

1. NH - Natural Hazards
2. HH - Historic Heritage
3. TREE - Notable Trees
4. SASM - Sites and Areas of Significance to Māori
5. ECO - Ecosystems and Indigenous Biodiversity
6. NATC - Natural Character
7. NFL - Natural Features and Landscapes
8. CE - Coastal Environment
9. EW - Earthworks
10. LIGHT - Light
11. NOISE - Noise
12. SIGN - Signs
13. TEMP - Temporary Activities

The rules in any zone chapter do not apply to amateur radio configurations unless specifically stated in a rule or standard in this chapter.

Rules relating to subdivision, including minimum allotment sizes for each zone, are found in the Subdivision chapter.

AR-R1 Amateur radio configurations

	Residential Zones Rural Zones Commercial and Mixed Use Zones General Industrial Zone Future Urban Zone Māori Purpose Zone (Hongoeka) Special Purpose Zone (BRANZ)	1. Activity status: Permitted Where: a. Compliance is achieved with: i. AR-S1; ii. AR-S2; iii. AR-S3; iv. AR-S4; v. AR-S5; vi. AR-S6; vii. AR-S7; and viii. AR-S8.
	Residential Zones Rural Zones Commercial and Mixed Use Zones	2. Activity status: Restricted discretionary Where: a. Compliance is not achieved with AR-S1, AR-S3, AR-S4, AR-S5, AR-S6, AR-S7 or AR-S8.

	General Industrial Zone	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. The matters of discretion of any infringed standard. <p>Notification: An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.</p>
	Future Urban Zone	
	Māori Purpose Zone (Hongoeka)	
	Special Purpose Zone (BRANZ)	
	Open Space and Recreation Zones	3. Activity status: Discretionary
	Hospital Zone	
	All zones	<p>4. Activity status: Non-complying</p> <p>Where:</p> <ol style="list-style-type: none"> a. Compliance is not achieved with AR-S2.
Standards		
AR-S1	General standard	
All zones	1. The amateur radio configuration must be owned and operated by a licensed amateur radio operator.	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. Any positive effects of the activity; 2. Health and safety of people and communities in the surrounding area; and 3. The ongoing management of the amateur radio configuration and its effects.
AR-S2	Radiofrequency	
All zones	1. All amateur radio configurations must be designed and operated in compliance with New Zealand Standards 2772.1:1999 Radiofrequency fields - Maximum exposure levels - 3 kHz to 300 GHz.	There are no matters of discretion for this standard.
AR-S3	Setbacks	
All zones	1. The relevant zone setback standards must be complied with.	Matters of discretion are restricted to:

		<ol style="list-style-type: none"> 1. Any positive effects of the activities; 2. Any adverse effects on the character and amenity values of the surrounding area; 3. Any adverse visual amenity effects on adjoining sites; and 4. The location of the structures and any alternative options.
Residential Zones Commercial and Mixed Use Zones	<ol style="list-style-type: none"> 2. Any part of an amateur radio configuration, including support structures, must not be located within the area of a site located between: <ol style="list-style-type: none"> a. A boundary of a site that adjoins a road; and b. A line parallel to a boundary defined in AR-S3-2.a, located at the point of the closest part of any building on the site to the boundary defined in AR-S3-2.a. 	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. Any positive effects of the activities; 2. Any adverse effects on the character, streetscape and amenity values of the surrounding area; 3. Any adverse visual amenity effects on adjoining sites; 4. Any topographical or other site constraints that make compliance with the standard impractical; and 5. The location of the structures and any alternative options.
AR-S4	Height	
All zones	<ol style="list-style-type: none"> 1. The maximum height of aerials and associated support structures attached to buildings must not exceed the permitted building height for the relevant zone by more than 5m. 	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. Any positive effects of the activities; 2. Any adverse effects on the amenity values of the surrounding area; 3. Any adverse visual amenity effects on adjoining sites; 4. The location of the structures and any alternative options; and 5. Cumulative effects associated with multiple devices and structures.
General Rural Zone	<ol style="list-style-type: none"> 2. The maximum height of support structures and 	<p>Matters of discretion are restricted to:</p>

Rural Lifestyle Zone Future Urban Zone	associated aerials mounted to the ground must not exceed: <ol style="list-style-type: none"> 20m for one support structure and associated aerials per site; and The permitted building height for the relevant zone for any support structures and associated aerials in addition to that allowed under AR-S4-2.a. 	<ol style="list-style-type: none"> Any positive effects of the activities; Any adverse effects on the character and amenity values of the surrounding area; Any adverse visual amenity effects on adjoining sites; The location of the structures and any alternative options; and Cumulative effects associated with multiple devices and structures.
Residential Zones Commercial and Mixed Use Zones General Industrial Zone Settlement Zone Special Purpose Zone (BRANZ) Māori Purpose Zone (Hongoeka)	<ol style="list-style-type: none"> The maximum height of support structures and associated aerials mounted to the ground must not exceed: <ol style="list-style-type: none"> 15m for one support structure and associated aerials per site; and The permitted building height for the relevant zone for any support structures and associated aerials in addition to that allowed under AR-S4-3.a. 	Matters of discretion are restricted to: <ol style="list-style-type: none"> Any positive effects of the activities; Any adverse effects on the character and amenity values of the surrounding area; Any adverse visual amenity effects on adjoining sites; The location of the structures and any alternative options; and Cumulative effects associated with multiple devices and structures.
AR-S5	Dish aerials	
All zones	<ol style="list-style-type: none"> Dish aerials located less than 5m above ground level must not exceed a diameter of 4m. Dish aerials located more than 5m above ground level must not exceed a diameter of 1.2m. There must not be more than two dish aerials per site. 	Matters of discretion are restricted to: <ol style="list-style-type: none"> Any positive effects of the activities; Any adverse effects on the character and amenity values of the surrounding area; Any adverse visual amenity effects on adjoining sites;

	4. The relevant zone height in relation to boundary standards must be complied with.	4. The location of the structures and any alternative options; 5. The finish of the material used on the structures; and 6. Cumulative effects associated with multiple devices.
AR-S6	Yagi aerials	
All zones	1. Any element making up an aerial must not exceed 80mm in diameter.	Matters of discretion are restricted to: 1. Any positive effects of the activities; 2. Any adverse effects on the character and amenity values of the surrounding area; 3. Any adverse visual amenity effects on adjoining sites; 4. The location of the structures and any alternative options; 5. The finish of the material used on the structures; and 6. Cumulative effects associated with multiple devices.
General Rural Zone Rural Lifestyle Zone Future Urban Zone	2. The element length must not exceed 14.9m. 3. The boom length must not exceed 13m.	Matters of discretion are restricted to: 1. Any positive effects of the activities; 2. Any adverse effects on the character and amenity values of the surrounding area; 3. Any adverse visual amenity effects on adjoining sites; 4. The location of the structures and any alternative options; 5. The finish of the material used on the structures; and 6. Cumulative effects associated with multiple devices.

Residential Zones Commercial and Mixed Use Zones General Industrial Zone Settlement Zone Special Purpose Zone (BRANZ) Māori Purpose Zone (Hongoeke)	4. The element length must not exceed 2m. 5. The boom length must not exceed 2m.	Matters of discretion are restricted to: 1. Any positive effects of the activities; 2. Any adverse effects on the character and amenity values of the surrounding area; 3. Any adverse visual amenity effects on adjoining sites; 4. The location of the structures and any alternative options; 5. The finish of the material used on the structures; and 6. Cumulative effects associated with multiple devices.
AR-S7	Number of aerials	
All zones	1. There must be no more than four aerials attached to ground mounted support structures per site; and 2. There must be no more than four aerials attached to buildings per site.	Matters of discretion are restricted to: 1. Any positive effects of the activities; 2. Any adverse effects on the character and amenity values of the surrounding area; 3. Any adverse visual amenity effects on adjoining sites; 4. The location of the structures and any alternative options; 5. The finish of the material used on the structures; and 6. Cumulative effects associated with multiple devices and structures.
AR-S8	Support structures	
All zones	1. There must be no more than one supporting structure per site that exceeds 120mm in diameter. 3. <u>2.</u> The maximum horizontal diameter of a pole or other	Matters of discretion are restricted to: 1. Any positive effects of the activities; 2. Any adverse effects on the character and

	<p>supporting structure allowed under AR-S8-1 must not exceed 800mm.</p> <p>3. There must be no more than six supporting structures per site with a horizontal diameter less than 120mm.</p> <p>4. Guy wires must not exceed 10mm in diameter.</p>	<p>amenity values of the surrounding area;</p> <p>3. Any adverse visual amenity effects on adjoining sites;</p> <p>4. The location of the structures and any alternative options;</p> <p>5. The finish of the material used on the structures; and</p> <p>6. Cumulative effects associated with multiple devices and structures.</p>
--	--	--

Appendix B. Recommended Responses to Submissions and Further Submissions

The recommended responses to the submissions made on this topic are presented in Table B 1 below.

Table B 1: Recommended responses to submissions and further submissions

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
General submissions							
264.55	Te Rūnanga o Toa Rangatira	General	Retain as notified.	n/a	Accept	Agree with submitter	No
224.8 ³	Titahi Bay Amateur Radio Club Inc. (TBARC) and New Zealand Association of Radio Transmitters (NZART)	General	Recognise the historical values and benefits of Amateur Radio in developing the Proposed Porirua District Plan.	3.2	Reject	Disagree with submitter. See body of report	No
224.9 ⁴	Titahi Bay Amateur Radio Club Inc. (TBARC) and New Zealand Association of Radio Transmitters (NZART)	General	Recognise in the context of the Proposed Porirua District Plan the long and mutual history and relationships of TBARC with PCC and its predecessor.	3.2	Reject	Disagree with submitter. See body of report	No
224.10 ⁵	Titahi Bay Amateur Radio Club Inc. (TBARC) and New Zealand Association of Radio Transmitters (NZART)	General	Note the history of TV reception in the Wellington Region as an example of "what might have been" had a different Council regulatory environment been in force at that time.	3.2	Reject	Disagree with submitter. See body of report	No
224.6 ⁶	Titahi Bay Amateur Radio Club Inc. (TBARC) and New Zealand Association of Radio Transmitters (NZART)	Evidence base	Acknowledge and accept the information provided on AREC in the Proposed Porirua District Plan, and use it to inform decision making.	3.2	Reject	Disagree with submitter. See body of report	No

³ Support - John Andrews [FS01.8], Murray Milner [FS03.8], Andre Lategan [FS66.8], John Linschoten [FS05.8], Bruce Officer [FS10.8], Wellington VHF Group Incorporated [FS11.8], NZART Br 63, Upper Hutt Amateur Radio Club UHARC [FS12.8], New Zealand Association of Radio Transmitters (Inc) [FS13.8], Amateur Radio Emergency Communications [FS24.8], Malcolm Wheeler [FS25.8], Branch 50 (Wellington) NZART [FS26.8], Ross Pedder [FS50.8].

⁴ Support - John Andrews [FS01.9], Murray Milner [FS03.9], Andre Lategan [FS66.9], John Linschoten [FS05.9], Bruce Officer [FS10.9], Wellington VHF Group Incorporated [FS11.9], NZART Br 63, Upper Hutt Amateur Radio Club UHARC [FS12.9], New Zealand Association of Radio Transmitters (Inc) [FS13.9], Amateur Radio Emergency Communications [FS24.9], Malcolm Wheeler [FS25.9], Branch 50 (Wellington) NZART [FS26.9], Ross Pedder [FS50.9].

⁵ Support - John Andrews [FS01.10], Murray Milner [FS03.10], Andre Lategan [FS66.10], John Linschoten [FS05.10], Bruce Officer [FS10.10], Wellington VHF Group Incorporated [FS11.10], NZART Br 63, Upper Hutt Amateur Radio Club UHARC [FS12.10], New Zealand Association of Radio Transmitters (Inc) [FS13.10], Amateur Radio Emergency Communications [FS24.10], Malcolm Wheeler [FS25.10], Branch 50 (Wellington) NZART [FS26.10], Ross Pedder [FS50.10].

⁶ Support - John Andrews [FS01.6], Murray Milner [FS03.6], Andre Lategan [FS66.6], John Linschoten [FS05.6], Bruce Officer [FS10.6], Wellington VHF Group Incorporated [FS11.6], NZART Br 63, Upper Hutt Amateur Radio Club UHARC [FS12.6], New Zealand Association of Radio Transmitters (Inc) [FS13.6], Amateur Radio Emergency Communications [FS24.6], Malcolm Wheeler [FS25.6], Branch 50 (Wellington) NZART [FS26.11], Ross Pedder [FS50.11].

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
224.11 ⁷	Titahi Bay Amateur Radio Club Inc. (TBARC) and New Zealand Association of Radio Transmitters (NZART)	General/history	Recognise the personal statement of the career of Dr Murray Milner as part of the total response of the Titahi Bay Amateur Radio Club Inc. to the Proposed Porirua District Plan.	3.2	Reject	Disagree with submitter. See body of report	No
224.4 ⁸	Titahi Bay Amateur Radio Club Inc. (TBARC) and New Zealand Association of Radio Transmitters (NZART)	General/benefits	The values and benefits of Amateur Radio be recognised by Porirua City.	3.2	Reject	Disagree with submitter. See body of report	No
224.7 ⁹	Titahi Bay Amateur Radio Club Inc. (TBARC) and New Zealand Association of Radio Transmitters (NZART)	Section 32 Report	Review and update Section 32 Evaluation Report Part 2 - Amateur Radio, Section 5 Resource Management Issues Analysis, Section 5.1 Background, para. 2: "amateur radio in emergencies is not sufficiently advanced".	3.2	Accept in part	Agree in part with submitter. See body of report	No
224.5 ¹⁰	Titahi Bay Amateur Radio Club Inc. (TBARC) and New Zealand Association of Radio Transmitters (NZART)	General/history	Acknowledgement is made in the Proposed Porirua District Plan that Amateur Radio has a long history of "Self Regulating".	3.2	Reject	Disagree with submitter. See body of report	No
224.3 ¹¹	Titahi Bay Amateur Radio Club Inc. (TBARC) and New	General/amenity values	Recognise the amenity values of amateur radio in the Proposed Porirua District Plan.	3.2	Reject	Disagree with submitter. See body of report	No

⁷ Support - John Andrews [FS01.11], Murray Milner [FS03.11], Andre Lategan [FS66.11], John Linschoten [FS05.11], Bruce Officer [FS10.11], Wellington VHF Group Incorporated [FS11.11], NZART Br 63, Upper Hutt Amateur Radio Club UHARC [FS12.11], New Zealand Association of Radio Transmitters (Inc) [FS13.11], Amateur Radio Emergency Communications [FS24.11], Malcolm Wheeler [FS25.11], Branch 50 (Wellington) NZART [FS26.11], Ross Pedder [FS50.11].

⁸ Support - John Andrews [FS01.4], Murray Milner [FS03.4], Andre Lategan [FS66.4], John Linschoten [FS05.4], Bruce Officer [FS10.4], Wellington VHF Group Incorporated [FS11.4], NZART Br 63, Upper Hutt Amateur Radio Club UHARC [FS12.4], New Zealand Association of Radio Transmitters (Inc) [FS13.4], Amateur Radio Emergency Communications [FS24.4], Malcolm Wheeler [FS25.4], Branch 50 (Wellington) NZART [FS26.4], Ross Pedder [FS50.4].

⁹ Support - John Andrews [FS01.7], Murray Milner [FS03.7], Andre Lategan [FS66.7], John Linschoten [FS05.7], Bruce Officer [FS10.7], Wellington VHF Group Incorporated [FS11.7], NZART Br 63, Upper Hutt Amateur Radio Club UHARC [FS12.7], New Zealand Association of Radio Transmitters (Inc) [FS13.7], Amateur Radio Emergency Communications [FS24.7], Malcolm Wheeler [FS25.7], Branch 50 (Wellington) NZART [FS26.7], Ross Pedder [FS50.7].

¹⁰ Support - John Andrews [FS01.5], Murray Milner [FS03.5], Andre Lategan [FS66.5], John Linschoten [FS05.5], Bruce Officer [FS10.5], Wellington VHF Group Incorporated [FS11.5], NZART Br 63, Upper Hutt Amateur Radio Club UHARC [FS12.5], New Zealand Association of Radio Transmitters (Inc) [FS13.5], Amateur Radio Emergency Communications [FS24.5], Malcolm Wheeler [FS25.5], Branch 50 (Wellington) NZART [FS26.5], Ross Pedder [FS50.5].

¹¹ Support - John Andrews [FS01.3], Murray Milner [FS03.3], Andre Lategan [FS66.3], John Linschoten [FS05.3], Bruce Officer [FS10.3], Wellington VHF Group Incorporated [FS11.3], NZART Br 63, Upper Hutt Amateur Radio Club UHARC [FS12.3], New Zealand Association of Radio Transmitters (Inc) [FS13.3], Amateur Radio Emergency Communications [FS24.3], Malcolm Wheeler [FS25.3], Branch 50 (Wellington) NZART [FS26.3], Ross Pedder [FS50.3].

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
	Zealand Association of Radio Transmitters (NZART)						
224.2 ¹²	Titahi Bay Amateur Radio Club Inc. (TBARC) and New Zealand Association of Radio Transmitters (NZART)	General/disaster relief	Acknowledge the responsibilities of Radio Amateurs in the requirement in the General User Radio Licence to "Prepare for and meet communications needs for disaster relief" in the Proposed Porirua District Plan. Requests to not be unreasonably impeded in fulfilling this requirement.	3.2	Reject	Disagree with submitter. See body of report	No
Yagi aerial standard for rural zones should be applied to the residential zones							
224.12 ¹³	Titahi Bay Amateur Radio Club Inc. (TBARC) and New Zealand Association of Radio Transmitters (NZART)	Residential zones	Amend the provisions for Yagi aerials in the Residential Zones. Otherwise, supports the provisions for Amateur Radio in the Proposed Porirua District Plan. Short aerial dimensions proposed for Yagi aerials in the Residential Zones are beyond the laws of radio physics and are unworkable for this purpose.	3.3	Reject	Disagree with submitter. See body of report	No
224.1 ¹⁴	Titahi Bay Amateur Radio Club Inc. (TBARC) and New Zealand Association of Radio Transmitters (NZART)	AR-S6	Amend AR-S6-4 and AR-S6-5 to match AR-S6-2 and AR-S6-3 respectively.	3.3	Reject	Disagree with submitter. See body of report	No
102.1	Craig Crawford	AR-S6	Amend maximum dimensions to permit the use of standard beam antennas accepted by almost all other local authorities to allow licensed amateur radio operators in residential zones to provide emergency communications (for example to apply dimensions similar to those proposed for rural zones).	3.3	Reject	Disagree with submitter. See body of report	No
Increase the permitted baseline for aerials, boom length and support structures in the General Rural Zone							
175.3	William Mike Arnold	AR-S7	Amend AR-S7-1 in the case of the General Rural Zone (GRZ) as follows:	3.4	Reject	Disagree with submitter. See body of report	No

¹² Support - John Andrews [FS01.2], Murray Milner [FS03.2], Andre Lategan [FS66.2], John Linschoten [FS05.2], Bruce Officer [FS10.2], Wellington VHF Group Incorporated [FS11.2], NZART Br 63, Upper Hutt Amateur Radio Club UHARC [FS12.2], New Zealand Association of Radio Transmitters (Inc) [FS13.2], Amateur Radio Emergency Communications [FS24.2], Malcolm Wheeler [FS25.2], Branch 50 (Wellington) NZART [FS26.2], Ross Pedder [FS50.2].

¹³ Support - John Andrews [FS01.12], Murray Milner [FS03.12], Andre Lategan [FS66.12], John Linschoten [FS05.12], Bruce Officer [FS10.12], Wellington VHF Group Incorporated [FS11.12], NZART Br 63, Upper Hutt Amateur Radio Club UHARC [FS12.12], New Zealand Association of Radio Transmitters (Inc) [FS13.12], Amateur Radio Emergency Communications [FS24.12], Malcolm Wheeler [FS25.12], Branch 50 (Wellington) NZART [FS26.12], Ross Pedder [FS50.12].

¹⁴ Support - John Andrews [FS01.1], Murray Milner [FS03.1], Andre Lategan [FS66.1], John Linschoten [FS05.1], Bruce Officer [FS10.1], Wellington VHF Group Incorporated [FS11.1], NZART Br 63, Upper Hutt Amateur Radio Club UHARC [FS12.1], New Zealand Association of Radio Transmitters (Inc) [FS13.1], Amateur Radio Emergency Communications [FS24.1], Malcolm Wheeler [FS25.1], Branch 50 (Wellington) NZART [FS26.1], Ross Pedder [FS50.1].

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
			<u>In the case of the GRZ, there must be no more than nine aerials attached to ground mounted structures per site.</u>				
175.4	William Mike Arnold	AR-S8	Amend AR-S8-2 to be labelled correctly. Amend AR-S8-3 (the one before Paragraph 4.) as follows: <u>In the case of the GRZ there must be no more than twelve supporting structures per site with a horizontal diameter less than 120mm.</u>	3.4	Reject	Disagree with submitter. See body of report	No
175.1	William Mike Arnold	AR-S5	Amend AR-S5-3 in the case of the General Rural Zone (GRZ) as follows: <u>The number of dish aerials in the case of the GRZ must not exceed nine per site.</u>	3.4	Reject	Disagree with submitter. See body of report	No
175.2	William Mike Arnold	AR-S6	Amend AR-S6-3 in the case of the General Rural Zone (GRZ) as follows: <u>In the case of the GRZ, there is no limit to the length of a rope Yagi.</u>	3.4	Reject	Disagree with submitter. See body of report	No

Report Author's Qualifications and Experience

Louise White – Intermediate Policy Planner, Porirua City Council

I hold the following qualifications:

- Bachelor of Resource and Environmental Planning, Massey University

I have 9 years' experience in working as a planner for local government. My work experience includes, amongst other matters, working for Regional Council Councils and City and District Council's processing resource consents.

I have been employed by the Porirua City Council since [November 2018] as a Policy Planner within the Environment and City Planning Team.