



The New Zealand Association of Radio Transmitters

Incorporated

Founder Member of the International Amateur Radio Union Region 3



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Submission of NZART on the Natural and Built Environments Bill

Introduction

The New Zealand Association of Radio Transmitters Incorporated (NZART) is the representative body for approximately 6,000 licensed Amateur Radio Operators (sometimes called Radio Hams) in New Zealand. NZART is a non-profit charitable society which was formed on 16 August 1926 and is managed by a team of volunteers with two paid part time employees.

Amateur Radio Operators are licenced under the Radiocommunications Act 1989 by Radio Spectrum Management (RSM), a division of The Ministry of Business, Innovation and Employment (MBIE). Amateur Radio Operators rights are recognised by the International Telecommunications Union, a specialised agency of the United Nations and the International Radio Regulations to which New Zealand is a signatory. Amateur Radio Operators operate on a non-commercial basis and often use their skills and experience to assist with communications for local events as well as Land Search and Rescue and other types of emergency communications. This is often done under the auspices of NZART's sub-group, Amateur Radio Emergency Communications (AREC) which has existing relationships with Police and LandSAR.

In exercising their rights Amateur Radio Operators may erect outdoor radio antennas. The specifications and type of antenna(s) which are permitted are in general governed by local district planning rules. Accordingly, NZART has had extensive experience in dealing with local councils regarding District Plan reviews and seeking adequate provision in those plans for the erection of Amateur Radio Antennas (ARAs) as a permitted activity. This allows Amateur Radio Operators to be able to communicate effectively without having to seek resource consent or in the worst case not being allowed to erect antennas at all.

NZART welcomes the opportunity to make a submission on the proposed introduction of the Natural and Built Environments Bill.

NZART supports the adoption of the National Planning Framework (NPF) and the rationalisation of Resource Management Act (RMA) policy statements, regional and district plans into under 20 Natural Build and Environment Plans (Plan). In addition, it wishes to make the following recommendations regarding system efficiencies, effectiveness, and the reduction of complexity.

President

Mark Gooding ZL2UFI

Vice President

Daniel Vandenberg ZL2DRV

Council: Howard Buxton ZL1BXA, Warren Harris ZL2AJ, Neill Ellis ZL1TAJ, Richard Harkett ZL2FY, Phil Holliday ZL3PAH, Don MacDonald ZL3DMC, Dave Mulder ZL4DK

Recommendations

1. When a Planning Committee is initially preparing and then subsequently reviewing a Plan, there should be one consistent clear and transparent process that every Planning Committee must follow to advertise the adoption of, or review of a Plan.

Comment:

In the past most Councils would clearly advertise a District Plan Review and undertake it as a whole. However more recently some Councils started introducing "Sectional Plan Reviews", (sometimes called "Rolling Reviews") in which different parts of the District Plan were reviewed sequentially and not altogether.

Councils' communication strategies are not always clear. In an attempt to communicate with its residents, one council simply advertised "Plan Change 4: Heritage" which was as NZART found out later, an early stage of their Rolling Review. Five years later they were up to Plan Change 47 "Plan Your Town". It appears that in neither of these Sectional Reviews, nor in any of the intermediate plan changes, did the advertisements indicate to residents that these were part of a mandatory 10-year District Plan Review. Thus, no local resident advised NZART that a District Plan review was taking place and NZART missed an opportunity to make submissions for the provision of ARAs.

This inconsistency in communication and practice makes it difficult for volunteer national organisations such as NZART and in NZART's case its local members, to become aware reviews are taking place.

Advertising should include in newspapers, New Zealand news websites and brochures included in the rates bill. There should also be the ability for organisations and individuals to subscribe to receive online notification of any upcoming Plan reviews.

2. Each Plan should as far as possible follows the same format and order when being prepared.

Comment:

It would be more efficient and reduce complexity for your average person if each Plan could as far as possible be set out in the same format and order and use the same terminology. This would make it easier for relevant content to be found and understood.

In NZART's experience provisions governing ARAs are not uniformly found in the same section of each District Plan (which in the case of Sectional Reviews made it even more difficult to establish when ARAs were being looked at). Since different councils have tended to choose different places to incorporate ARAs, or in some cases had none at all, it can become difficult to know which section NZART should present its submissions on. In one case an NZART Submission was put into council at an early stage of the process. Council said it would let the NZART know when the appropriate section was being reviewed, but they never did so. Consequently, the review process was completed without NZART having the opportunity to submit at the appropriate time.

Furthermore, definitions and terminology relating to ARAs vary from District Plan to District Plan and are often based on the understanding of a local planner or the previous provisions. The ability to introduce (in our case) consistent, standard terminology for ARAs would we believe make it easier to make

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submissions on ARAs for every Plan. Over time this would also lead to a standard understanding of ARAs on the part of Planning Committees.

3. The adoption and review of Plans should be staggered

Comment:

Currently NZART may be involved in as many as 25 reviews at any one time. This can be extremely time consuming for its volunteers and very expensive as an organisation to fund any objections especially when outside counsel is sought. For a small organisation with on average a membership of approximately 1700 people, the ability to continually monitor and challenge District Plan reviews is well beyond what we as an organisation can do in the medium to long term. With the proposed adoption of up to 20 Plans under the new Act, a staggered process would enable people and organisations with an interest in more than one Plan to be able to adequately raise any matters and make submissions as well as reduce the cost. The same would apply to reviews.

4. There should be one website where all Plans can be viewed and up to date information provided with regard to reviews being undertaken.

Comment:

Currently District Plans are often hosted on the website of the local council and not in a uniform way. One central website would make for easier access and greater transparency. Furthermore, it should be possible to run a subscription service so interested parties can receive notice of upcoming Plan changes or reviews (see comments to recommendation 1 above).

5. Clause 8(o)(i) of the Bill should be amended by the inclusion of “educational” after “social”.

Comment:

Education is an important part of community wellbeing. Amateur Radio is also an educational activity. The Amateur Radio Licence allows operators to design and build their own electronic radio equipment, because it is specifically set up as an experimental and/or technology development service. It is the only radio service in which it is the licensed operator, and not the equipment, that is licensed. In ALL other types of radio service, it is a requirement that “type approved” equipment which has been rigorously third party tested to meet tight technical specifications must be used, and that equipment must not be modified.

An introduction to Amateur Radio has encouraged students to study Science, Technology, Engineering and Mathematics (STEM)– subjects which are in significant demand and keep New Zealand a significant player in international technology development.

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6. Clause 8(o) of the Bill should be amended by the inclusion of a sub paragraph (iii) which states “the provision of emergency services”.

Comment:

With the prevalence of recent floods as well as Aotearoa New Zealand’s susceptibility to earthquakes and other natural disasters, there has never been a greater need to ensure we have taken all possible steps to quickly respond when these events occur. As noted in the introduction, Amateur Radio Operators have a long history in providing emergency communications, commencing with the Napier Earthquake in 1931. The provision of ARAs as part of the NPF, along with other emergency services will allow the required infrastructure to be set up to support local communities in times of natural disasters.

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