

Guardians of the Bays Hearing Submission on Wellington International Airport Ltd Two Designations (Main Site and Eastern Side Area)

Presented 20 May 2021 by Yvonne Weeber, Chairperson Guardians of the Bays

1. Introduction Guardians of the Bays

- 1.1 My name is Yvonne Beth Weeber and I am presenting as Chair of Guardians of the Bays (GOTB). I have been a member of the GOTB since its inception and presently Chair.
- 1.2 GOTB is an incorporated society that represents over 500 concerned individuals as a broad-based residents' group opposed to the proposal to extend the runway at Wellington International Airport (WIAL) – as well as further expansion plans into Miramar Peninsula and Rongotai Isthmus residential suburbs. We represent the interests of many other groups, including residents' associations, environmental and recreational groups, and businesses. Our membership includes lawyers, politicians, policymakers, business owners, recreational clubs, marine ecologists, health professionals, architects, pilots and aviation professionals and several economists. We have consulted with the community, undertaken research and objected to WIAL's expansion plans since 2013.
- 1.3 The goals of GOTB have widened to incorporate the original environmental objectives. Our goals can now be summarised as:
 - a. protection of the marine life and coastline adjacent to the airport
 - b. concern about climate change which would be exacerbated by continuing promotion of air travel, and increased emissions from aircraft and transport to/from the airport
 - c. the real danger of sea-level rise which puts at risk many low-lying areas, including the airport itself
 - d. concern that ratepayers' and taxpayers' money should not be expended on airport expansion when many other pressing human, social, resilience and infrastructure challenges confront Wellington.

2. Personal Qualifications and Experience

- 2.1 I am currently a Senior Advisor with the Department of Internal Affairs. My evidence is not related to any of my current employment and the statement of evidence is written on behalf of GOTB and using my professional judgment.
- 2.2 I hold urban design, landscape architecture and plant ecological qualifications. I hold a Masters of Arts in Urban Design , a Postgraduate Diploma in Landscape Architecture and First Class Honours Bachelor of Science majoring in Plant Ecology. I am a registered member of the New Zealand Institute of Landscape Architecture and an active member of the New Zealand Urban Design Forum. I have experience working throughout New Zealand as an urban designer and landscape architect. I have been a resident of Rongotai and Lyall Bay for the majority of my life.

3. Submitter information not placed on Wellington City Council website and no summary of submissions

- 3.1 The GOTB submission represents the view of our members. We would have liked to have considered wider community submissions in greater detail however Wellington City Council has not placed submissions made by the public on their website. While the reasoning was for privacy it is clear that this is a very public process that everyone needs to have the full

information. Other councils such as Auckland Council have privacy information clearly stating that all information may be made available on the Council's website.

- 3.2 Without all the submitters submissions being made available to everyone who is taking part in this process, be it the requiring authority, the council, their experts or the submitters, we are not participating in a fair, transparent or equitable process. I finally received a copy of the our fellow submitters submissions on the 6 May 2021 but no other submitters got it.
- 3.3 In addition there was no summary of submissions undertaken by Wellington City Council to help submitters understand what submissions may be relevant to them. Thankfully the Section 42A report from Mark Ashby for Wellington City Council provided information on the exemplar submissions.

4. Key aspects of our submission we wish the Hearing Panel to consider

- 4.1 GOTB opposes the East Side Area Designation into the Airport and Golf Precinct (12.6ha), the southern end of the Miramar Golf Course, which will primarily be used for taxiway purposes with other associated activities and structures (extension of the existing airport terminal), as shown in the draft WIAL '*WLG 2040*' *Master Plan*.
- 4.2 GOTB is of the view that there are significant effects both in amenity and noise that cannot be mitigated with conditions to the Notice of Requirement.
- 4.3 GOTB believes the Eastern Side Area should be withdrawn on climate change grounds alone due to inability to mitigate climate change effects.
- 4.4 GOTB opposes the increased flexibility that is being proposed in the Main Designation (primarily over the area of land zoned Airport Precinct in the District Plan). We submit that this flexibility will occur at the detriment of environment, amenity, health and welfare of the surrounding residential community.
- 4.5 GOTB supports the use of 'design statements' within the designation but proposes and supports Robin Simpson that WIAL goes further and develops design guides, with community consultation, for both designations.
- 4.6 Our hearing submission takes our written submission as read and adds to our submission at this hearing by concentrating on:
- Multiple designations, conditions and management plans
 - Climate change targets
 - Urban design and visual effects
 - Airport golf precinct
 - Noise
 - Infrastructure
 - Conditions

5. Multiple designations make a fractured planning regime and complex timeframes

- 5.1 GOTB is concerned at the fractured planning regime of multiple designations that are being used by WIAL. This does not make it easy for the community to participate in the designation process or understand the difference between conditions of each area. This is especially an issue when the designation adjoins one another, and you have contiguous aircraft taxi ways going from one area to another such as the Eastern Side Area and the Main designation. It is not possible for the general public to understand the complexity of the multiple designation process that WIAL has developed. I would also suggest that it will be difficult for WIAL and WCC to understand the boundary lines between the Main Site and East Site Area designations.
- 5.2 Added to the multiple designations is the multiple different planning frameworks in conditions, management plans, different air noise boundaries and district plan rules for each one of these designations. It was clear from the Hearing on Wednesday 19 May 2021 that even the Hearing Panel was struggling to understand the multiple layers of the complex

arrangements and trying to bring at least the conditions of the two NORs together to read as one. Having the airport brought under the planning rules of the District Plan would for the community be a lot easier to understand and bring more certainty of decision making than the present and proposed set of WIAL NOR's.

- 5.3 The unstructured way of planning within the WIAL site area appears to have created inappropriate building placement within the airport site and created the necessity of the proposed East Side Area plan if the airport wishes to expand. This means that instead of a golf course, carpark and building buffer as exists at present the residents get the planes closer to them with the carpark and buildings being placed in the centre of the terminal activity area.
- 5.4 If the NOR is not withdrawn the proposed timeframes to create a 'final' outcome are not certain. From the hearing yesterday it became clear that earth will be moved and then 'stored' somewhere on the WIAL site. Storage of earth will in itself create a number of environmental issues for the residents close by prior to the earth being moved again to its final destination.
- 5.5 GOTB asks what is happening to the area of land along the eastern side of Bridge Street (north west boundary of WIAL) where houses have been removed. Why is this land not part of the Main Designation (*see power point photo*)? Does this mean that community must face this area of airport blight for a number of undetermined years prior to another designation being created in future for development on this land?
- 5.6 WIAL continuous development of designations creates a relentless expanding set of cumulative effects that downgrade the amenity of the surrounding environment that the community must endure. WIAL's designation process is not fit for purpose for the community that surrounds it. Having been involved in Independent Hearing Panels from both a community and council perspective more thought needs to be given to how you involve the community in this type of planning process. The use of an independent community planner paid for by the requiring authority, as used in proposals of national significance, would help in promoting community involvement in WIAL's designation processes.

6. Wellington Airport expansion and extension plans are a threat to New Zealand's, Greater Wellington's and Wellington's climate change targets

- 6.1 GOTB has submitted that WIAL has failed to consider the economic impact of likely measures required to reduce greenhouse gas emissions, and in particular the economic effects of measures taken to reduce and/or offset greenhouse gas emissions from air travel, during the lifetime of the project.
- 6.2 Mr Sapsford expert evidence cast considerable doubt on the claims of economic benefits suggesting that WIAL's modelling is out of date and deficient.
- 6.3 GOTB would like to add that WIAL's expansion plans of the eastern designation threaten the emission reduction targets of Greater Wellington and Wellington City Council Long Term Plans in two ways by:
 - a. Directly proposing to grow emissions with increased passengers numbers and therefore aircraft movements in particular in an increase of long haul flights.
 - b. Indirectly requiring greater petrol driven private car journeys to the airport. While GOTB's are aware that the land transport options to the airport will include electric vehicles (both private and public transport) and potentially in the next ten years some form of mass rapid transit. However, there will continue to be the predominance of fossil fuel petrol driven vehicles in the next ten years as seen in the designs of WIAL with their extensive new carparking areas as part of the designation process. GOTB strongly advocates for mass rapid transit, improved walking and cycling provisions to access WIAL. However there also needs to be a ongoing reduction of carparking numbers at WIAL rather than an increase.
- 6.4 At present aviation and marine sector in Wellington create almost 20% of the city's emissions as noted in the [Te Atakura Implementation Plan](#). Bold steps will be required reduce these

emissions. The WIAL designation proposals being considered in this hearing appear to only support a rapid increase in climate changing emissions.

- 6.5 WIAL's own experts, Ken Conway Head of Environment and Sustainability for Airbiz Aviation Strategies Limited acknowledges that electric aircraft or hydrogen fuelled aircraft are a long way off and it would be in the mid 2030's or beyond before or if there ever will be electric or hydrogen fuelled aviation. Having an aspiration goal of sustainability is very different from actually being sustainable. GOTB is not satisfied that there are sustainable fuel alternatives. We therefore submit that any proposals to expand Wellington Airports operations will lead directly to increased greenhouse gas emissions from aviation.
- 6.6 GOTB opposes the expansion of the number of flights into and out of Wellington Airport and in particular long-haul flights on the grounds that it will have significant implications on the Wellington Regions and Wellington City's emissions.
- 6.7 GOTB notes that WIAL has not taken into account that the Climate Change Commission will be required by 31 December 2024 to provide written advice to the Minister of Climate Change on whether the 2050 target of targets on climate changing emissions should be amended to include emissions for international shipping and aviation.
- 6.8 GOTB submits that the travel demand scenarios which underpin this proposal have not considered the climate emergency. The effects of climate change include the economic effects over the next 30 to 50 years of the proposal including any prolonged drop in global GDP, or a high mitigation carbon price set by the international community.
- 6.9 GOTB submits that WIAL should undertake transport modelling for the next few decades to test the climate emergency constraints and consider alternatives rather than the generalised 'forecast demand' used in these designations.
- 6.10 GOTB oppose any increase in aviation from WIAL and submit that direct and indirect emissions from the airport should be capped and then progressively reduced.
- 6.11 GOTB is aware that there will be strong behavioural change to reduce flights from WIAL airport due to public sector being required to be carbon neutral by 2025. This will require the public agencies to measure and publicly report on their emissions and to offset any emissions they cannot cut by 2025. One thing that Covid-19 has shown the public sector is that they don't need to fly as often as they had in the past. This reduction in WIAL public sector patronage has not been reflected in any of the WIAL forecasts.

7. Urban design and visual effects

- 7.1 GOTB is only to aware that WIAL is working in a constrained environment. The picture of Wellington Airport overlaid on Auckland Airport in the Airbiz evidence shows it all (*see power point photo*). Therefore we seriously question the ongoing expansion into the surrounding non-airport green space buffer areas such as the Miramar Golf Course and residential neighbourhood for anything other than airport safety. WIAL must start understanding its limited site area and working within these boundaries and stop expanding into buffer areas and adjoining residential neighbourhoods.
- 7.2 GOTB is aware the visual catchment into the airport is wide. We would have appreciated a mapping exercise being undertaken by WIAL's landscape architecture expert showing exactly how many residential properties would be able to view into the proposal. GOTB is aware that views from the Melrose, Miramar and Strathmore Hills will be able to see into the proposed East Side Area and they will see the cumulative effects of more tarmac, buildings, lights and retaining walls made of concrete or battered cut greywacke. (*see power point photos*).
- 7.3 GOTB supports the Council's Urban Designer and Landscape Architect Robin Simpson evidence that more conditions are required in respect to urban design. Clearly the built form is an important aspects of WIAL's designation and future development. We disagree with WIAL that they have provided appropriate conditions with only vague urban design principles being proposed in the management plans and outline plan process. We support having an urban

design guide for the airport to improve the design quality of the airport and how it integrates with the neighbouring community. A design guide would also provide an important way of the community understanding what standard and parameters WIAL developments should be designed to. In addition a design guide should clearly consider the integration of the airport with the surrounding area so that any similar appalling visually intrusive ExecuJet hanger is not built again (*see photo*).

- 7.4 GOTB opposes the buildings heights of 30 metres height in the Terminal Precinct as it is excessive and will greatly increase the magnitude of visual effects to the surrounding community and WIAL has not demonstrated the need for this height.
- 7.5 GOTB agrees with the Council Urban Designer and Landscape Architect Robin Simpson that the removal of the hill (described in the hearing as a hillock) that to extend the taxiway to the south will create a significant negative visual effect on the landscape character. The hill is a geological remnant of a Lyall Bay coastline and that existed prior to the airports construction in the 1950s (*see power point photos*). Of note in the 1959 book the Great Harbour of Tara this point and this hillock was called Moa Point. With what we call Moa Point now being recorded as Hue-te-taka peninsula. When seen from various angles it makes a gateway statement to Stewart Duff Drive, creates a natural feature of considerable height and breadth when on the existing airport open carpark and tells a narrative of something that was there in the past. GOTB supports the view that the hillock is part of the southern coast and should not be removed.
- 7.6 GOTB agrees with the Council Urban Designer and Landscape Architect Robin Simpson that Rongotai Ridge should be removed from the Main Designation and managed through the District Plan due to its extreme visibility from the neighbourhoods of Miramar, Evans Bay, Haitaitai and Mt Victoria and roads of Cohham Drive and Calabar Road. In addition GOTB does not want the southern hill or the Rongotai Ridge greywacke material used for airport extension fill as has been moted by WIAL officials in the past.
- 7.7 GOTB agrees with Council Urban Designer and Landscape Architect Robin Simpson that a cohesive design is required for the Broadway, Calabar Road, and the Kauri St. However, any cohesive design approach needs to include the collaboration with the community not just WIAL, WCC and Greater Wellington and possibly transport agencies undertaking the design of mass rapid transit options to Wellington.
- 7.8 GOTB would support the use of a lighting management plan rather than conditions for both the WIAL's designations. This would give the community more certainty of what to expect with the lighting of the airport. This is important when some residential houses will be below the lighting illumination if the Eastern Side Area designation is approved. A lighting management plan should also include the development and ongoing maintenance that occurs within the designations which requires night-time activities such as resurfacing the tarmac.

8. Airport and Golf Recreation Precinct

- 8.1 GOTB opposes the East Side Area designation as it will bring the airport directly next to the residential dwellings of Strathmore Park residential houses. It does this by removing the majority of the southern Miramar Golf Course Recreational Precinct. This precinct is the buffer between the airport and the residential houses of Strathmore Park. This introduction of this precinct in the Wellington City Council District Plan explicitly says that this land is not meant for airport purposes.

The provisions of the Golf Course recreation area provide for the continued use of the existing Miramar Golf Course and recreational activities. It is not intended that the land used for these recreational activities will be used for Airport purposes.

Further that the golf course and recreation lands have a distinctive character and use that is not for airport purposes.

Policy 10.2.1.3 Identify the Golf Course and recreation lands as the other area of the Precinct with a distinct character and uses.

- 8.2 GOTB opposes the East Side Area designation as the green space of the golf course contributes to the quality of life and wellbeing for large numbers of local residents and visitors, and that this quality of life will be removed with this designation. The removal of this part of the golf course will result in significant negative adverse effects that cannot be mitigated or could not be considered meet WIAL's objective of sustainable manner operations, maintenance and upgrades.
- 8.3 Further information is given to these aspects in our written submission.

9. Noise

- 9.1 GOTB is opposed to the East Side Area designation due to the adverse noise effects that will occur in particular to the residents of Raukawa Street, Bunker Way and Kekerenga Street. Other submitters will be covering noise effects in greater detail. GOTB supports the community submitters in their opposition to the East Side Area designation on the grounds of noise effects
- 9.2 GOTB does not believe the conditions in respect to APU usage will be complied to and will not be enforceable. Having different APU standard operating procedures over different parts of the airport will make it impossible for air companies to comply with. I ask WIAL via the Hearing Panel Chair are there any other airports that has this type of split APU operating procedure working and being effectively enforced?
- 9.3 GOTB opposes WIAL being granted a localised exceedance of the Air Noise Boundary (the bulge) because they want to move the noisier activities of the airport closer to residential houses in Strathmore Park. The Air Noise Boundary is in place to manage WIAL's noise in the agreed boundaries. If WIAL wants to alter this they must work with the Council and community to develop a new Air Noise Boundary. GOTB also asks is the way WIAL is asking for this noise bulge actually legal?

10. Infrastructure effects

- 10.1 GOTB wishes to inform the Hearing Panel that stormwater from WIAL is an issue when it directly discharges into the sea at Lyall Bay due to the non-filtering of contaminants from the runway and airport facilities and the volume of the discharge with heavy rain. The panel should note that the eastern end of Lyall Bay where the stormwater runoff exists is a high recreation use area for walkers, swimmers and surfers (see photo). This area also has significant erosion and the volume of stormwater runoff is one of the major factors that is considered in relationship to this erosion. GOTB will be talking to Greater Wellington about WIAL's stormwater consent.

11. Conditions

- 11.1 GOTB would have liked to have been able to spend some time looking at the revised conditions after the Joint Witness Statements were finalised. Unfortunately, this has not been possible as this information only became available to submitters on Tuesday afternoon at 3.48pm.
- 11.2 GOTB supports stronger conditions than those initially proposed by WIAL initially in their designation. We also support the conditions of consent for the Main Site and the East Site Area (if it gets approved) are kept as similar as possible as they are contiguous areas of land.