

DRAFT MASTER PLAN FOR WELLINGTON INTERNATIONAL AIRPORT

**SUBMISSION FROM WELLINGTON CITY COUNCIL
AUGUST 2009**

1. Introduction

Wellington City Council (the Council) welcomes the opportunity to provide a submission on Wellington Airport's draft Master Plan (the Plan).

The proposals put forward in the Plan are important for the City, not only from an economic viewpoint, but also because of its close proximity to the surrounding suburban areas and local communities. The Airport is unique in this regard. Its location within a highly urbanised setting is both an advantage and a disadvantage.

On one hand, and as part owner of the Airport, the Council has an interest in how the Plan performs from a business point of view. On the other hand, as its role as a public custodian and regulatory authority, the Council needs to ensure the development and planning initiatives proposed in the Plan do not adversely affect the surrounding suburban areas.

The comments below reflect this dual interest. The Council welcomes the opportunity to work with the Airport planners to address the issues raised in the submission and the implementation of the Plan.

2. General Comments

The Council strongly supports the overall direction and initiatives set out in the Plan. The approach taken in the Plan is concise and clear, and well supported by its graphic illustrations and layout.

The Council supports the balanced approach taken in the Plan between business planning and the long-term interests of the community. Its preparation is timely and necessary to ensure Wellington Airport maintains and enhances its important economic role and function in the Region.

The Council also appreciates the special recognition in the Plan to district and regional planning requirements – as this is an area where the Council plays a lead role in setting the ground rules for activities in and around the Airport.

3. Specific Comments

3.1. Forecasts

Sections 2.5 (Passenger, aircraft and freight forecasts), 2.8 (Airport vehicle demand forecast) and 2.9 (Car parking forecasts)

The Council notes the expected doubling of passenger numbers to about 10.5 million by 2030 and recognises the positive economic benefits this will have for the city. Associated with the increase in passenger numbers, the Plan notes that airport vehicle demand is expected to increase by 60% and that car parking requirements are expected to double. Increases of this nature have the potential to significantly affect the local and regional transport network without careful consideration and planning.

The expected fivefold increase in freight volumes (from 5,000 tonnes to 28,000 tonnes) is of interest to the Council, in terms of likely storage and space requirements, and the impacts on the surrounding road network. It is noted in section 8.5 of the Plan that capacity (in terms of space) exists to 2020 but there may be a need to re-configure leases to cope with anticipated growth beyond 2020.

Further discussion on the implications of these forecasts on the transport system is included in section 3.5 (Access to the Airport) below.

3.2. Contribution to the region's economy

The Council appreciates the commentary in the Plan and associated background research regarding the airport's contribution to the region's economy, both now and into the future. This confirms the importance of the role of the airport as one of the fundamental drivers of economic activity in the region. This section of the Plan, in explaining this important economic role, provides a useful context and rationale for the initiatives set out in the following sections of the Plan.

The Council recognises the importance of the Airport in achieving the outcomes set out in the Wellington Regional Strategy, particularly in relation to bringing in direct, long haul flights to Wellington (key area 3 of the WRS). Research carried out as part of the Wellington Regional Strategy shows that long haul capacity is a core component of successful regions due to the advantages it provides for tourism, exporting and business travel.

The Council, along with other councils and agencies in the region, has supported long-haul flights for several years now with an expectation the new 787s will be a viable option for at least one carrier. While the Plan rightly maintains a positive outlook on this, there may be a need to review the phasing aspects of the Plan given the many delays by Boeing and also the future for air travel (not just the current downturn which is a shorter timeframe).

3.3. Plan for the airfield

Section 4.2- Safeguarding airport operations

The Council strongly supports the aim to prevent any further 'obstacle limitation surface' obstructions and will continue to ensure they are safeguarded through the Wellington City District Plan.

Section 4.3 – Improving runway capacity

The Council notes that the creation of new taxiways is likely to increase the amount of impermeable surfaces and increase run off. At present the existing

grass may act as a filter for any contaminants from the airport operation. Removing this grass and increasing the amount of impermeable space has the potential to increase the contamination load discharged to Lyall Bay. The Council is pleased to note that this has been considered in table 9.1 of the Plan.

Section 4.4 – Planning for large aircraft operations

The Council acknowledges the importance of realigning Calabar Road to meet the airport's future regulatory and operational requirements. In doing so it stresses the importance of this proposal being advanced in a sensitive and careful way to minimise community concern and ensure all regulatory and statutory requirements are met.

As part of this, the realignment of Calabar Road (as a State Highway) would be required to comply with NZTA's recently released "*Stormwater Treatment Standard of State Highway Infrastructure*" (March 2009).

The Council notes that the Calabar Road realignment, should it proceed, would directly affect several Council housing units in this area – primarily units at 48, 50, 54 Calabar Road. It is noted that, following discussion with City Housing, the tenants of all three properties were informed by WIAL of the potential impacts when the Plan went public.

While some of the housing in the general area may feature in the Housing Upgrade Project, the Council will continue to work with WIAL to ensure a smooth transition through the process of re-alignment as set out in the Plan. This would include ensuring appropriate access is provided to 48 Calabar Road once the re-alignment is complete.

It is noted that some properties would be removed to make way for the re-alignment and this would reduce Council's stock of family properties in this area. The process would need to ensure the Council is in a position to replace this housing stock elsewhere in the City.

Section 4.6 – Expanding the Western Apron

The Council notes the proposal to acquire land on the western side of the runway (Coutts St) which may require a change to the District Plan over the long term. As with the Calabar road re-alignment proposals, the Council stresses the importance of this proposal being advanced in a sensitive and careful way to minimise community concern and ensure all regulatory and statutory requirements are met. The Council is aware of, and supports, the approach to developing a joint agreement with affected landowners in Coutts Street.

Section 4.7 – Enhancing tunnel access

The Council supports the proposal to provide dual access to the existing east/west access tunnel to enable secure access for small airport vehicles in addition to continued public use. In doing so, the Council considers there to be an opportunity to make improvements to the tunnel to ensure better levels of safety for all users, including the public.

Section 4.8 – Enabling a runway extension

Section 4.8 of the Plan indicates that an extension to the runway may be required in the future due to regulatory or operational imperatives. The

options put forward include a 100m extension to north and a 500m extension to the south.

The implications of extending the runway are not insignificant, particularly with the extension to the south. To proceed, this would require a major reclamation and would trigger a wide variety of statutory processes associated to development in and around the coastal marine area. A development of this nature would also need to carefully consider the impacts (including noise) on the existing residential dwellings at Moa Point.

The Council understands and considers it appropriate to foreshadow long term aims such as this in the Plan. However, care needs to be taken in the way in which this is portrayed, particularly if there is insufficient justification under current operations. The use of the term 'runway extension reserve' has statutory connotations and suggests that justification exists – which is not the case. To this effect, the Council suggests it would be more appropriate to foreshadow the long term aims in a more informal manner in the Plan.

3.4. Plan for the terminal precinct

The Council supports the plans for the terminal precinct and considers the approach to be well thought out considering the limited space available.

3.5. Ensuring access to the airport

Section 6.1 – The current situation

The Plan recognises that increases in demand for transport to and from the airport will have significant impacts on the region's transport network. The aims of the Plan to incorporate public transport development into future planning, and to integrate with Wellington's regional transport strategy is strongly supported by the Council.

Section 6.2 – Addressing access to the airport

The Council notes the important linkages made in the Plan to the Ngauranga to Airport study, which includes initiatives to improve the route to the Airport as well as improving public transport services (including a light-rail feasibility study).

While some modelling has been carried out as part of the Ngauranga to Airport Study, the Council is aware that this did not specifically include the predicted airport growth figures as these were not available at the time. However, a feasibility study (led by the New Zealand Transport Agency) for improving transport from the airport to the city is scheduled for 2011/12 and this will include roading and public transport improvements.

WIAL should also be aware that as part of the 'Centres Planning Forward Programme', the Council has agreed to undertake a planning study on the wider Miramar Peninsula/Eastern Suburbs area in the 2010/11 and 2011/12 years. As an integrated planning and consultation exercise, this study would enable the future proposals for the Airport to be considered within the context of the wider Eastern Suburbs area.

The timing of these studies provides an opportunity for the proposed increases set out in the draft Master Plan to be considered jointly by WIAL, the Council and other agencies with an interest in strategic transport and land use planning (such as Greater Wellington Regional Council and the New Zealand Transport Agency). It also provides an opportunity to consider other transport modal options as a way of reducing the impacts of increased vehicle numbers on the roading network.

A key consideration will be around the scale of improvements required to infrastructure and transport systems and how this is funded. Investment will be required from a range of parties including WIAL, Greater Wellington Regional Council and central government agencies such as the New Zealand Transport Agency. Joint discussions will need to be held early between all relevant parties. Given the high levels of expected growth in the airport area, the Council may also need to further consider the role of development contributions.

Section 6.3 – Access to landside services

The Council notes the proposal to develop the eastern side of Bridge Street from residential to carparking. The Council is generally supportive of a land use change in this area, particularly given the existing high noise levels. The Council considers that a change of this nature would (in the long term) best be facilitated through a District Plan change. As part of this the Council would need to consider the impacts of such a change on adjacent residential areas. WIAL may wish to refer to the LUMINs study as providing some of the justification and analysis behind such a proposal.

The Council would also like to emphasise that (should change of land use proceed) there is a significant opportunity to provide alternative access to the Western apron and adjacent retail/business areas direct from Cobham Drive via Bridge Street (parallel to runway). One of the benefits of this proposal would be to direct traffic to these areas away from the current routes which are residential in nature.

3.6. Enabling commercial development

Section 7.2 - Airport retail park

The Council notes the proposal to develop airport-owned sites on the western side of Tirangi Road for a range of commercial uses including trade retail businesses. The Council supports a wide range of uses (including many forms of retail) in this area. It is anticipated that the District Plan will continue to provide for most forms of retail as a permitted activity under the upcoming Suburban Centres plan change. Research has shown, however, that some forms of retail such as supermarkets, hypermarkets and large integrated retail developments could have significant adverse impacts on both the roading network and the viability of other existing centres. As such the Council will be closely examining any proposals for these specific types of retail uses in this area.

Section 7.3 – the Airport gateway

The Council supports the commitment to ensure that any development on land to the north of the terminal precinct will be accessible by foot. This aligns with comments received from the public about poor pedestrian access to the airport.

Section 7.5 – Acquiring land

The Council supports the openness in the Plan about the need to acquire land to enable commercial development. Early involvement with the Council would be appreciated in these situations, particularly where changes to the District Plan are proposed.

3.7. Ensuring effective land use

Section 8.2 – Working with the District Plan

The Council supports the balanced reference to the District Plan, as an enabler and protector.

Section 8.5 – Air cargo

The Council notes the expected five-fold increase in freight related cargo and the capacity expectations to around 2020. As discussed earlier, increases in freight-related cargo need to be planned for and managed carefully to avoid impacts on the road network and surrounding suburban environment. Any further increases in freight volumes beyond what is planned for may need to be tempered given the constraints on land availability in this general location.

Section 8.14 – Utilities

The City's main wastewater pipeline (the Interceptor) flows from Ngauranga Gorge through the central city beneath Mt Victoria to Moa Point. This intercepts all wastewaters from the Wellington area, except Karori and the northern suburbs, serving a population of approximately 130,000. The interceptor runs parallel to Endeavour Street to the end of Coutts Street then southwards down the western side of the runway and around its southern end. The Council notes that any extension work will need to take the interceptor and future maintenance and management into consideration.

The Plan states that "The existing sewer main should continue to meet our needs until 2030, although we may need another major sewer line to the Moa Point Treatment Plant." Clarification is required as to whether this new major sewer line is to serve the airport alone or to replace the existing public interceptor pipe.

Clarification is required as to whether current water supply can meet current demand and future increases in demand. Additional demand at the airport combined with future growth in the eastern suburbs may necessitate potable water infrastructure investment and/or demand management strategies to be put in place.

The Plan states "Our system has the capacity required to remove stormwater from the airside apron and landside terminal and parking areas for the entire

Master Plan period. The only work required may be pipe renewals and new connections into the main trunk lines". The Plan should acknowledge that any work to the trunk main would happen directly under the runway and airport buildings and that any renewals need to be considered in the wider context. The airport stormwater catchment includes the southern part of the Wellington Airport, all of Miramar Golf Course, as well as part of Strathmore Park. It covers a total area of 143 ha of which an estimated 50% is impervious (mostly in airport buildings, runway and car-parks). This is a predominantly commercial and light industrial catchment, which also includes approximately 250 residential properties and a residential population of 1,020. This catchment discharges to 6 outfalls in Lyall Bay, the two most substantial being at the north end of Moa Point Road, and near the breakwater at the south end of the runway.

3.8. Protecting our environment

Section 9.1 – Our commitment to environmental sustainability

The Council strongly supports the general commitment in the Plan to environmental sustainability, including the focus on building design and infrastructure design, maintaining and protecting water quality, and protecting the coastal marine environment by managing stormwater.

Section 9.2 – Aircraft Noise

The Council is encouraged by the positive trends regarding aircraft noise. WIAL may consider referring to the role of the Air Noise Committee (through which the LUMIN's work is being managed) as a positive approach to dealing with noise and land use planning. Reference to the Air Noise Committee could also be added as a possible mitigation method in table 9-1.

Sections 9.4 (Using energy efficiently) and 9.5 (Addressing climate change issues)

The Council strongly supports the intent of the Plan to support and encourage energy efficiency and address climate change issues. Going forward, this will become an increasingly important area to consider in future planning. The Airport and Council will need to take a leading role in energy efficiency and climate change.

In particular the Council commends the steps aimed at reducing energy consumption, investigating renewable energy options, increasing energy efficiency in buildings and working with airlines and Airways New Zealand to explore ways to reduce greenhouse gas emissions. Around 15% of the city's greenhouse gas emissions result from the aviation fuel pumped into planes at Wellington Airport. The Council is currently developing a Climate Change Action Plan that will identify actions aimed at reducing greenhouse gas emissions in the city. It is imperative that Wellington Airport and the major airlines take a leadership role in developing responses to the issue of aviation emissions. The Council is interested in formalising these commitments, possibly through a memorandum of understanding.

Given the Airport's geographical position, it is also important that impacts and risks from climate change on the Airport's operations and infrastructure is

understood. Risk areas could include sea level rise and storm surge impacting infrastructure and operations as well as how the likely increase in major storm events might disrupt air traffic.

Section 9.6 – Protecting stormwater quality

The Council strongly supports the Plan's aim to protect stormwater quality. Wellington Airport has large impervious surface areas and is a potentially significant source of contamination given the large quantities of aviation fuels used and stored on site. The Council is pleased to see consideration of stormwater treatment systems, such as swales proposed for development and expansion of the airport.

The Council notes that there several new (or newly proposed) legislative documents (GWRC's Regional Policy Statement, The National Policy Statement for Freshwater Management and the New Zealand Coastal Policy Statement) which may require significant consideration given to stormwater management in new developments.

The proposals in the Plan are in line with these documents and offer the opportunity to minimise the impact of airport operations on coastal marine ecology including sediments of Lyall Bay. The Council supports the proposal in the Plan to progressively install stormwater interceptors in redevelopment areas. WIAL may also wish to consider reusing rainwater from their extensive roof and other hard surfaces for toilet flushing. This fits with a commitment to 'sustainable business'.

Section 9.7 – Protecting our coastal marine environment

The Council appreciates emphasis in the Plan on protecting the coastal marine environment for future generations and strongly supports the statement that a scrupulous planning approach be used regarding any land reclamation proposals.

3.9. Implementation

Section 10.2 – A staged approach

The Council supports the transparent approach to land acquisition set out in the Plan and the way it clearly outlines why land acquisition is required.

The Council notes that District Plan changes may be required in the long term to facilitate some of the land use changes foreshadowed in the Plan (e.g. Bridge Street residential to carparking). The LUMIN's study, although driven by airport noise, will also consider land use changes for areas outside the Airport Precinct but within the Air Noise Boundary. There is clearly an opportunity to ensure an integrated approach between the District Plan, the Master Plan and the LUMIN's study. WIAL may want to consider referencing these connections in the Plan.

3.10. Other matters

High quality urban design

While the draft Master Plan is generally supportive of best practice approaches for development for aspects such as energy-efficiency and sustainable infrastructure design, there is also an opportunity to adopt quality urban design principles for all new building development. Additional reference could be made to this in the Plan. WIAL could also consider becoming a signatory to the New Zealand Urban Design Protocol.

Lyall Bay interface area

The interface area between the Airport Retail Park and Lyall Bay is particularly important due to the nature of activities that occur along Lyall Bay Parade. There is potential to improve the building edge to Lyall Bay and connections to and from the beach and the Council would welcome opportunity to work jointly with WIAL on potential solutions for this area.

Working relationship with WIAL

The above discussion highlights that there a number of key areas where the Council and WIAL have a common interest. Moving forward, it will be critical that the Council maintains and further develops a good working relationship with WIAL. The Council welcomes the opportunity to work with the Airport planners to address the issues raised in the submission and the implementation of the Plan.