

**Before an Independent Hearings Panel of Wellington District
Council**

Under the Resource Management Act 1991

In the matter of the hearing of submissions and further submissions on the
Proposed Wellington City District Plan (**PDP**)

And

In the matter of Hearing Stream 8

SUBMISSIONS ON BEHALF OF WELLINGTON INTERNATIONAL AIRPORT LIMITED

Hearing Stream 8 – Coastal Environment

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Amanda Dewar | Barrister

P: 021 2429175

Email: amanda@amandadewar.com

PO Box 7

Christchurch 8140

- 1.1** These brief submissions are filed on behalf of Wellington International Airport Limited (**WIAL**), a submitter on the Wellington City Council (**WCC**) Proposed District Plan (**PDP**) in relation to Hearing Stream 8 – Coastal Environment.
- 1.2** WIAL has filed evidence from:
- (a) Jo Lester, Planning Manager, WIAL;
 - (b) Kirsty O’Sullivan, Associate, Mitchell Daysh Limited.
- 1.3** The Council’s s42A Report and subsequent supplementary evidence dated 19 April authored by Mr Sirl has gone some way in alleviating WIAL’s concerns as set out its submission and Ms O’Sullivan’s evidence.
- 1.4** In particular, the supplementary evidence has recommended a number of Ms O’Sullivan’s suggested amendments to the Chapter’s Introduction bringing it more in line with the NZCPS as a whole and a better integration with other Chapters of the Plan.
- 1.5** I will leave it for Ms O’Sullivan to respond to the more technical concerns where there is still disagreement.
- 1.6** However one matter within the Introduction which has not been adopted by the reporting officer is the paragraph describing the specific development pathway for the City Centre, Port and Airport based on the Coastal Environment Chapter as well as the relevant zone chapter in recognition of their benefits and locational requirements. Mr Sirl has recommended the following:

The framework below provides a specific pathway for any development within either the City Centre Zone, ~~or the Wellington Airport Zone, and~~ operational port activities, passenger port facilities and rail activities ~~within the Port Zone. Any Airport and port activities within these zones the City Centre Zone or are associated with the Wellington Airport, operational port activities, passenger port facilities and rail activities~~ are assessed against their own specific objectives, policies and rules ~~in this chapter and the relevant zone chapter~~. This is in recognition of the social and economic benefits these activities have, ~~their functional and operational need to be located where they are,~~ and that their position in the City is largely fixed.

- 1.7 Ms O’Sullivan’s suggested amendments sought to add to the description of the Airport so that it included airport infrastructure outside of the airport zone such as the seawalls and navigational aids:

The framework below provides a specific pathway for any development within either the City Centre Zone, ~~or the Wellington Airport Zone, and~~ operational port activities, passenger port facilities and rail activities within the Port Zone. ~~Any a~~ Activities Airport and port activities undertaken within and outside of these zones ~~the City Centre Zone or are associated with the Wellington Airport, operational port activities, passenger port facilities and rail~~ are assessed against their own specific objectives, policies and rules in this chapter and the relevant zone chapter. This is in recognition of the social and economic benefits these activities have, their functional and operational need to be located where they are, and that their position in the City is largely fixed.

- 1.8 It also appears that in the s42A redrafting, the full reference to the City Centre Zone has been lost along the way. I have attempted to simplify the drafting as follows (my suggested amendments highlighted in yellow):

The framework below provides a specific pathway for any development within either the City Centre Zone, ~~or the Wellington~~ Wellington International Airport Zone, and operational port activities, passenger port facilities and rail activities within the Port Zone. ~~Any a~~ Activities Airport and port activities undertaken within and outside of these zones ~~the City Centre Zone or are associated with the Wellington Airport, operational port activities, passenger port facilities and rail~~ Development in these areas are assessed against their own specific objectives, policies and rules in this chapter and the relevant zone chapter. This is in recognition of the social and economic benefits these activities have, their functional and operational need to be located where they are, and that their position in the City is largely fixed.

- 1.9 In relation to CE-P10, I note at paragraph 42 of Mr Sirl’s Supplementary evidence he agrees with Ms O’Sullivan’s alternate suggestion to amend the policy to be specific to the activities the Plan seeks to avoid i.e. new quarrying and mining activities and new plantation forestry as follows:

Avoid the establishment of quarry, mining or plantation forestry activities that are incompatible with, or detrimental to, the natural character and qualities within the landward extent of the coastal environment.

- 1.10 However this recommendation has not made it into Mr Sirl’s Appendix.

1.11 In my submission even with this amendment the policy is still far too broad for an “avoid policy” in the context of the entire coastal environment and Policy 13 of the NZCPS but at least with the amendments above it is limited in terms of its scope.

Amanda Dewar

Counsel for Wellington International Airport Ltd