

BEFORE THE INDEPENDENT HEARINGS PANEL AT WELLINGTON CITY | MUA NGĀ  
KAIKŌMIHANA WHAKAWĀ MOTUHAKĒ NGĀMOTU O TE WHANGANUI-A-TARA  
UNDER THE Resource Management Act 1991

IN THE MATTER OF the hearing of submissions on the Proposed Wellington City  
Plan

HEARING TOPIC Hearing Stream 5

Yvonne Weeber Personal Submission Statement for Hearing Stream 5

1 August 2023

**1. Introduction**

- 1.1 This is a personal submission. I have professional qualifications in landscape architecture and urban design however, the majority of this submission is that of a lay person as the areas discussed are out of the area of my expertise.
- 1.2 I support the Guardians of the Bays submission.
- 1.3 I have strong connections to the southern coast and eastern suburbs of Wellington having lived in Rongotai and Lyall Bay for most of my life.
- 1.4 I am involved in a number of community groups including being the Chair of Guardians of the Bays, actively involved in Lyall Bay Coast Care, Predator Free Lyall Bay and 4C Climate Change Coastal Community-Hapori Takutai – Huringa Āhuarangi.
- 1.5 This submission considers noise and coastal hazards.

**2. Noise**

- 2.1 Wellington Airport was constructed within a residential community. The houses were predominately built from 1910 through to 1940 on Rongotai Isthmus and Miramar South. To construct the airport around 180 houses had to be removed from Rongotai Terrace and transported to reclaimed land along Rongotai Road and Kemp Street.
- 2.2 The local community has therefore lived with the airport and its noise for a considerable time. Noise issues peaked in the 1970s with the arrival of very noisy and extremely sooty polluting 737 jets. I was a primary school student at Miramar South School only a block away from the airport when the jets started landing at Wellington Airport. When the jets were landing and taking off my primary school teachers had to stop talking. The house that I grew up in at 186 Coutts Street is in the proposed Outer Noise Overlay. Aviation noise levels fortunately have reduced due to new technology and quieter planes. I hope that aviation noise continues to decrease around Wellington Airport rather than increase and the Outer and Inner Noise Overlay can be reduced in size in future.
- 2.3 One only has to think back to the Covid-19 lockdowns of 2020 to realise how silent and relaxing the local coastal environment could be without Wellington Airport noise. During those lockdowns you could hear the roar of the waves rather than the roar of a taking off and landing aeroplanes. The removal of the incessant whine of a taxing or parked jet plane allowed you to hear the birds and insects. The removal of bird control gunshot made you realise what a safe environment you lived in rather than wondering if you needed to call the police over an actual gun incident.

- 2.4 Evidence has been given about noise reverse sensitivity with a comparison of Wellington Airport with Whenuapai Airport. These two airports and their surrounding areas are totally different. I was involved urban design planning for Whenuapai Structure Plan in 2016 when I worked at Auckland Council. Whenuapai Airport is a military base operating 24 hours a day and 7 days a week. It is surrounded until recently with rural or lifestyle blocks. The residential development potential around Whenuapai Airport is considerable and would be very different to the existing community around Wellington Airport. Open air 24 hours 7 days a week military jet aircraft engine testing at Whenuapai Airport had negative health issues on the workers and local community even before residential intensification around the airport was considered.
- 2.5 I see intensification as positive but also believe additional residential dwellings within noise overlays areas especially the inner noise overlay is problematic. However, residential houses need to be able to be modified or replaced to improve liveability. Creating onerous conditions on improvements and or replacement of old or badly built dwellings in the air noise overlays is not positive and can create a situation of airport blight. In the local Lyall Bay community many of the residential changes have been in the total replacement and upgrading of a residential dwelling. This type of redevelopment is positive and improves the residential housing stock within the community.
- 2.6 Consideration of the ongoing health issues caused by aircraft noise needs to be considered in the District Plan. Use of up to date information such as the 2018 World Health Organisation Environment Noise Guidelines for the European Region should be considered in current New Zealand planning. The old 31 year old NZS6805:1992 Airport Noise Management and Land Use Planning standard should be updated.
- 2.7 The night time curfews imposed on Wellington airport are positive and make it bearable to sleep undisturbed for at least a small part of the natural sleep cycle.
- 3. Natural Hazards and Coastal Hazards**
- 3.1 My submission sought to clarify the mapping of coastal hazards on the maps of the District Plan. District Plan maps should be reinforced by the words in the District Plan. The lines, patterns and words on the maps are important in conveying what the actual District Plan is saying. The maps and the words of a District Plan need to work together to provide a total package.
- 3.2 When I first analysed the Proposed District Plan maps I thought there was an arbitrary mix of hazard and risk overlays. The more I analysed the maps and their relationship to the words in the Proposed District Plan the more perplexed I became. It was very difficult to work out on the maps the coastal inundation, liquefaction and Tsunami Hazard Overlays. Planning maps should and are normally very easy to understand. It wasn't just burdensome to work out how the hazard ranking table in the Introduction of the Coastal Environment Chapter related to the maps it was impossible as it was not explained anywhere in the plan that these were going to be the mapping lines.
- 3.3 I am glad that mapping amendments are being considered in the evidence of Mr Sirl improve the interpretation of low, medium and high hazard areas. However, a draft map visual of what was being proposed by Mr Sirl would have been useful for submitters and the Panel to understand the layers and what they would look like. Kainga Ora [406.13] has requested that the separate layers can be turned off and on individually in the GIS viewer. This appears to be possible now and is a positive way to reduce clutter and allow greater analysis of specific issues on the District Plan Maps.
- 3.4 I support the clarity in the definition of the Coastal Hazard Overlay. However, does this mean that the Coastal Inundation Overlay and Tsunami Hazard Overlay are brought

together on the map in one mapping tool? At present the two map tools that relate to the coastal environment are separated by Fault, Flood and Liquefaction Hazard Overlays.

- 3.5 I support the inclusion of wording that coastal inundation is added to the Introduction of Coastal Hazards. It is not only sea level rise but also storm surges and storm events that form a coastal hazard, as outlined in the NIWA report on Coastal Hazards and sea-level rise in Wellington City.
- 3.6 Maintaining the reality of the natural hazard and coastal hazard overlays over all the land that could be affected both residential and for large landowners such as Wellington Airport is important in understanding the true risk of these hazards to our coastal communities.
- 3.7 I agree with the changes being proposed for CE-P12 Levels of risk, especially in the change from addresses to minimises in the mitigation of subdivision, use and development.
- 3.8 I agree with the changes to CE-P15 Subdivision and hazard sensitive activities within the low coastal hazard areas, CE-P16 Potentially hazard sensitive activities within the medium coastal hazard areas and other areas of the plan using a common term minimise. The use of a common the term 'minimises' is useful throughout the plan in relationship to coastal hazards. However, it needs future guidance on what as the definition of minimisation proposed 'the means to reduce as low as reasonably practicable' isn't clear and moves the plan on to what 'reasonably practicable' actually means.
- 3.9 CE-P26 Hard engineering measures (P1 Sch1), CE-R24 All hard engineering measures in the high coastal hazard area (ISPP) in relationship to maintenance and repair and CE-PX Repair and maintenance of existing hard engineering natural hazard mitigation works in the high coastal hazard area, are all parts of the plan that will be used increasingly with sea level rise, storm surges and storm events. Giving permitted activity status to such works could be problematic when we should be considering adaptation and even retreat from the high coastal hazard area.
- 3.10 I agree with the changes to CE-R27 Hazard sensitive activities within the high coastal hazard area, excluding the City Centre Zone or Airport, operation port activities, passenger port facilities and rail activities (ISPP) that clearly identify that it is "the construction of new buildings or the conversion of existing building that contain hazard sensitive activities" being non-complying.