

# Section 32 Evaluation Report

## Part 2: Airport

## Contents

<b>1.0</b>	<b>Overview and Purpose</b> .....	<b>4</b>
1.1	Introduction to the resource management issue/s .....	4
<b>2.0</b>	<b>Reference to other evaluation reports</b> .....	<b>4</b>
<b>3.0</b>	<b>Strategic Direction</b> .....	<b>5</b>
<b>4.0</b>	<b>Regulatory and policy direction</b> .....	<b>6</b>
4.1	Section 6 .....	7
4.2	Section 7 .....	7
4.3	Section 8 .....	8
4.4	National Direction .....	8
4.4.1	National Policy Statements .....	8
4.4.2	Proposed National Policy Statements .....	11
4.4.3	National Environmental Standards .....	11
4.4.4	National Planning Standards .....	12
4.5	National Guidance Documents .....	13
4.6	Regional Policy and Plans .....	14
4.7	Iwi Management Plan(s).....	17
4.8	Relevant plans or strategies .....	18
4.9	Other relevant legislation or regulations .....	21
<b>5.0</b>	<b>Resource Management Issues Analysis</b> .....	<b>21</b>
5.1	Background.....	21
5.2	Evidence Base - Research, Consultation, Information and Analysis undertaken.....	22
5.2.1	Analysis of Operative District Plan provisions relevant to this topic.....	23
5.2.2	Advice received from Taranaki Whānui and Ngāti Toa Rangatira .....	25
5.2.3	Consultation undertaken to date .....	26
5.3	Summary of Relevant Resource Management Issues.....	27
<b>6.0</b>	<b>Evaluation of the Proposal</b> .....	<b>30</b>
6.1	Scale and Significance .....	30
6.2	Quantification of Benefits and Costs .....	32
<b>7.0</b>	<b>Zone Framework</b> .....	<b>33</b>
<b>8.0</b>	<b>Overview of Proposal/s</b> .....	<b>34</b>
<b>9.0</b>	<b>Evaluation of Proposed Objective/s</b> .....	<b>36</b>
9.1	Introduction .....	36
9.2	Evaluation of Objectives .....	36
<b>10.0</b>	<b>Evaluation of Reasonably Practicable Options and Associated Provisions</b> .....	<b>43</b>
10.1	Introduction .....	43
10.2	Evaluation method .....	43
10.3	Provisions to achieve Objectives.....	43
<b>11.0</b>	<b>Conclusion</b> .....	<b>59</b>

## Table of acronyms

<b>Abbreviation</b>	<b>Full term</b>
<b>AIRPZ</b>	Airport Zone
<b>CAUDG</b>	Central Area Urban Design Guide
<b>CDP</b>	Christchurch District Plan
<b>CIA</b>	Cultural Impact Assessment
<b>CVR</b>	Cultural Values Report
<b>GWRC</b>	Greater Wellington Regional Council
<b>IHPP</b>	Inner Harbour Port Zone
<b>MUFP</b>	Multi-User Ferry Precinct
<b>NES</b>	National Environmental Standards
<b>NPS</b>	National Policy Statement
<b>NPS-UD</b>	National Policy Statement for Urban Development 2020
<b>NZCPS</b>	New Zealand Coastal Policy Statement 2010
<b>PDP</b>	Proposed District Plan
<b>PNRP</b>	Proposed Natural Resources Plan
<b>PORTZ-PREC</b>	Port Precinct
<b>PORZ</b>	Port Zone
<b>RMA</b>	Resource Management Act
<b>RPS</b>	Regional Policy Statement for the Wellington Region 2013
<b>SASM</b>	Sites and Areas of Significance to Māori
<b>WIAL</b>	Wellington International Airport Limited

## 1.0 Overview and Purpose

### 1.1 Introduction to the resource management issue/s

The purpose of the Airport Zone is to provide for the ongoing management and development of Wellington International Airport. The Airport is identified by the Wellington Regional Policy Statement (RPS) as regionally significant infrastructure. As such, the RPS requires the district plan to recognise the benefits of the Airport, and to include policies and rules that protect it.

Wellington International Airport Limited (WIAL) is the Airport's owner and operator and is also a Requiring Authority for designations. The zone provisions underly and reflect WIAL's existing designations, to ensure the management of effects if the designations were ever uplifted. The activities of third parties are also covered by the zone provisions.

The extent of the Airport Zone reflects WIAL's 2022 designation (confirmed via Environment Court mediation and a consent order), enabling future development on the southern part of Miramar golf course. The need for development within that extension is based on projected increases in air traffic movement out to 2050.

Because there are designations in place, potential future Airport development is already authorised – either without further process, or subject to conditions, or with the submission of an outline plan of works to the Council. Where proposed development is not covered by the terms and conditions of the designations, resource consent may be required<sup>1</sup>. The Airport Zone chapter therefore sets out the policy and regulatory framework for land use activities undertaken within the Zone that trigger the need for resource consent to be obtained by WIAL or third parties.

A primary external (beyond the zone boundaries) effect of the Airport is noise. Aircraft noise is subject to conditions of the designations, which are reflected in district plan provisions in the Noise chapter. Some of those Noise chapter provisions refer to a noise overlay that extends outside the Airport Zone itself. Another issue is the urban design impact of built development within the Airport Zone. Designation conditions place limits on that development, but anything exceeding those limits would be subject to district plan provisions and the likely need for a resource consent. A third significant issue is the generation of land transport movements accessing the Airport; pre-Covid, there are estimated to be around 16,000 to 17,000 daily car trips<sup>2</sup> to and from the Airport using the Cobham Drive route – with much of that comprising taxis or other unbranded hire vehicles. Public transport has been estimated to account for less than 10% of trips to/from the Airport<sup>3</sup>.

## 2.0 Reference to other evaluation reports

This report should also be read in conjunction with the following evaluation reports:

Report	Relationship to this topic
Noise	This chapter contains the section 32 evaluation in relation to district plan management of noise associated with the Airport Zone.
Light	This chapter contains the section 32 evaluation in relation to district plan management of lighting associated with the Airport zone.

<sup>1</sup> This includes in the Rongotai Ridge part of the Airport Zone, as the WIAL designation does not apply to that land

<sup>2</sup> Table 5, N2A Model, Technical Note 08: Forecasting Methodology, *Ngauranga to Airport Transport Model, Compiled Technical Documentation*, Beca, June 2019

<sup>3</sup> Planning for Growth, Issues and Opportunities Report, WCC, April 2019

Signs	This chapter contains the section 32 evaluation in relation to district plan management of signage associated with the Airport Zone.
Coastal Environment	This chapter contains the section 32 evaluation in relation to district plan management of the coastal environment (which covers most of the Airport Zone), and including coastal hazards potentially affecting Airport Zone.
Earthworks	This chapter contains the section 32 evaluation in relation to district plan management of earthworks associated with the Airport Zone (including Rongotai Ridge).
Energy, Infrastructure and Transport	This chapter contains the section 32 evaluation in relation to district plan management of infrastructure and transport. The Airport is regionally significant infrastructure and is an integral part of the City and region's transport network.

### 3.0 Strategic Direction

The following objectives in the Strategic Direction chapter of the Proposed District Plan that are relevant to this issue/topic are:

<b>CC-03</b>	<b>Development is consistent with and supports the achievement of the following strategic City goals:</b>
Development is consistent with and supports the achievement of the following strategic city objectives:	
<ol style="list-style-type: none"> <li>1. Compact: Wellington builds on its existing urban form with quality development in the right locations;</li> <li>2. Resilient: Wellington's natural and built environments are healthy and robust, and we build physical and social resilience through good design;</li> <li>3. Vibrant and Prosperous: Wellington builds on its reputation as an economic hub and creative centre of excellence by welcoming and supporting innovation and investing strategically to maintain a thriving economy;</li> <li>4. Inclusive and Connected: Wellington recognises and fosters its identity by supporting social cohesion and cultural diversity, has world-class movement systems and attractive and accessible public spaces and streets;</li> <li>5. Greener: Wellington is environmentally sustainable and its natural environment is protected, enhanced and integrated into the urban environment; and</li> <li>6. Partnership with mana whenua: Wellington recognises the unique role of mana whenua within the city and advances a relationship based on active partnership.</li> </ol>	
<b>CEKP-01</b>	<b>A range of commercial and mixed use environments are provided for in appropriate locations across the City to:</b>
<ol style="list-style-type: none"> <li>1. Promote a diverse economy</li> <li>2. Support innovation and changes in technology</li> <li>3. Facilitate alternative ways of working.</li> </ol>	
<b>CEKP-03</b>	<b>Mixed use and industrial areas outside of Centres:</b>
<ol style="list-style-type: none"> <li>1. Complement the hierarchy of Centres</li> <li>2. Provide for activities that are incompatible with other Centres-based activities; and</li> </ol>	

3. Support large scale industrial and service-based activities that serve the needs of the City and wider region.	
<b>CEKP-05</b>	
Strategically important assets including those that support Māori culture, tourism, trade education, research, health are provided for in appropriate locations.	
<b>SCA-01</b>	<b>Infrastructure is established, operated, maintained, and upgraded in Wellington City so that</b>
<ol style="list-style-type: none"> <li>1. The social, economic, cultural, and environmental benefits of this infrastructure are recognised;</li> <li>2. The City is able to function efficiently and effectively;</li> <li>3. The infrastructure network is resilient in the long term; and</li> <li>4. Future growth and development is enabled and can be sufficiently serviced.</li> </ol>	
<b>SCA-04</b>	
Regionally significant infrastructure is provided for in appropriate locations and the social, cultural economic, and environmental benefits of this infrastructure are recognised and provided for.	
<b>SCA-05</b>	
The adverse effects of infrastructure are managed having regard to the economic, social, environmental and cultural benefits, and the technical and operational needs of infrastructure.	
<b>SCA-06</b>	
Infrastructure operates efficiently and safely and is protected from incompatible development and activities that may create reverse sensitivity effects.	

An evaluation of these objectives is contained in the companion Section 32 Evaluation Overview Report.

#### 4.0 Regulatory and policy direction

In carrying out a s32 analysis, an evaluation is required of how the proposal achieves the purpose and principles contained in Part 2 of the RMA.

Section 5 sets out the purpose of the RMA, which is to promote the sustainable management of natural and physical resources.

Sustainable management '*means managing the use, development, and protection of natural and physical resources to enable people and communities to provide for their social, economic and cultural wellbeing and for their health and safety, while -*

- (a) *sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
- (b) *safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
- (c) *avoiding, remedying, or mitigating any adverse effects of activities on the environment*'.

In achieving this purpose, all persons exercising functions and powers under the RMA also need to:

- Recognise and provide for the matters of national importance identified in s6
- Have particular regard to the range of other matters referred to in s7

- Take into account the principles of the Treaty of Waitangi/Te Tiriti o Waitangi in s8.

#### 4.1 Section 6

Although the Airport sits within / alongside the coastal environment, the Airport Zone does not provide for physical expansion into coastal areas beyond the present boundaries. The s6 matters that are relevant to this topic are:

Section	Relevant Matter
6(a)	<p>The preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development.</p> <p>The Airport does exist within the coastal environment. Although it is a highly modified environment, surrounded by other urban development, the nearby coastline still retains characteristics that Wellington's south coast is known and valued for. The environment has both natural values and recreational values, such as the Lyall Bay surf break.</p>
6(d)	<p>The maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers.</p> <p>The Airport is sited in close proximity to the coastal margin. However, the boundaries of the Airport Zone do not extend down to the waterline and existing available access along the coast will remain as it is at present.</p>
6(h)	<p>The management of significant risks from natural hazards.</p> <p>The coastal nature of the Airport puts it at risk in relation to larger tsunamis. However, at a minimum, the Main Site runway lies a minimum of 5 metres above mean sea level.</p>

#### 4.2 Section 7

The s7 matters that are relevant to this topic are:

Section	Relevant Matter
7(b)	<p>The efficient use and development of natural and physical resources.</p> <p>The Airport is a regionally significant physical resource. As such, its use and development are protected by designations; the Airport Zone provisions underly and support the designations, as well as providing for situations not covered by the designations.</p>
7(c)	<p>The maintenance and enhancement of amenity values.</p> <p>Existing and potential future Airport operations have a significant effect on the occupants of some nearby properties. These existing and potential effects include noise and visual amenity. Vehicle traffic generated by growth in the Airport can also impact on amenity values in a wider neighbourhood.</p>
7(f)	<p>Maintenance and enhancement of the quality of the environment.</p>

	Effects referred to under sections 7(c), 7(g) and 7(i), taken together, may contribute to overall reductions in the quality of the environment. With ongoing development of the Airport Zone, it is likely that some aspects of environmental quality will be neither maintained nor enhanced. This applies particularly within the East Side Area, if that development proceeds as proposed by WIAL.
7(g)	Any finite characteristics of natural and physical resources.  The Airport is constrained in the area it can occupy and in the extent of external areas it can be reasonably expected to affect.  WIAL is constrained in its options for facilitating development and growth at the Airport; the location and availability of suitable land to achieve the Airport's objectives is a relevant finite characteristic of ongoing development.
7(i)	The effects of climate change.  Aircraft using the Airport, and land transport attracted to the Airport, are predominantly carbon based and therefore contribute to climate change.  Climate change will be exacerbated by air traffic growth, if liquid carbon-based fuels continue to be the motive power for airplanes.

### 4.3 Section 8

In evidence for the May 2021 NOR hearing, WIAL stated that *“There do not appear to be any particular issues in respect of the various tangata whenua aspects of Part 2, including sections 6(e), 7(a), 7(aa) and 8. This conclusion is supported by reports WIAL has commissioned in the past relating to the cultural and archaeological significance of the Airport and wider environs. Based on the information contained in these reports, the proposed East Side NOR does not appear to directly affect any known Māori site of significance, or other known archaeological site of significance. ... No submissions were also received from any Mana Whenua that identified any further issues relating to either of the proposed NORs.”*<sup>4</sup>

In their NOR recommendation report, the independent commissioners accepted that position.

### 4.4 National Direction

#### 4.4.1 National Policy Statements

There are five National Policy Statements (NPS) currently in force:

- NPS for Electricity Transmission 2008
- New Zealand Coastal Policy Statement 2010
- NPS for Renewable Electricity Generation 2011
- NPS for Freshwater Management 2020
- NPS on Urban Development 2020

Of those five NPS, the two instruments and associated provisions relevant to this topic are the NPS-UD and the NZCPS.

<sup>4</sup> Statement of Evidence of John Clifford Kyle for Wellington International Airport Ltd, 5 May 2021



NPS	Relevant Objectives / Policies
NPS on Urban Development 2020	<p>In relation to densification where affected by Airport noise (note that this matter has influenced development of the Noise chapter).</p> <p>Nationally significant infrastructure means all of the following:</p> <p>(h) any airport (but not its ancillary commercial activities) used for regular air transport services by aeroplanes capable of carrying more than 30 passengers</p> <p>3.31 Tier 1 territorial authorities implementing intensification policies</p> <p>(2) If the territorial authority considers that it is necessary to modify the building height or densities in order to provide for a qualifying matter (as permitted under Policy 4), it must:</p> <p>(a) identify, by location, where the qualifying matter applies; and</p> <p>(b) specify the alternate building heights and densities proposed for those areas.</p> <p>3.32 Qualifying matters</p> <p>(1) In this National Policy Statement, qualifying matter means any of the following:</p> <p>(c) any matter required for the purpose of ensuring the safe or efficient operation of nationally significant infrastructure</p> <p>(e) an area subject to a designation or heritage order, but only in relation to the land that is subject to the designation or heritage order</p> <p>(h) any other matter that makes high density development as directed by Policy 3 inappropriate in an area, but only if the requirements of clause 3.33(3) are met.</p> <p>3.33 Requirements if qualifying matter applies</p> <p>(2) The evaluation report prepared under section 32 of the Act in relation to the proposed amendment must</p> <p>(a) demonstrate why the territorial authority considers that:</p> <p>(i) the area is subject to a qualifying matter; and</p> <p>(ii) the qualifying matter is incompatible with the level of development directed by Policy 3 for that area; and</p> <p>(b) assess the impact that limiting development capacity, building height or density (as relevant) will have on the provision of development capacity; and</p> <p>(c) assess the costs and broader impacts of imposing those limits.</p>

Note: The Airport Zone is within the coastal environment but does not directly abut the coastline. At its southern and north ends, the Airport Zone is separated from the coastline by a combination of legal road and land zoned Natural Open Space. Notwithstanding that fact, a purpose of the Airport designation is to enable “Structures to mitigate against the impact of natural hazards”.

Policy 1 Extent and characteristics of the coastal environment

(2) Recognise that the coastal environment includes:

- (i) physical resources and built facilities, including infrastructure, that have modified the coastal environment.

Policy 6 Activities in the coastal environment

(1) In relation to the coastal environment:

- (a) recognise that the provision of infrastructure, the supply and transport of energy including the generation and transmission of electricity, and the extraction of minerals are activities important to the social, economic and cultural well-being of people and communities;
- (b) consider the rate at which built development and the associated public infrastructure should be enabled to provide for the reasonably foreseeable needs of population growth without compromising the other values of the coastal environment;

Policy 25 Subdivision, use, and development in areas of coastal hazard risk

In areas potentially affected by coastal hazards over at least the next 100 years:

- (a) avoid increasing the risk of social, environmental and economic harm from coastal hazards;
- (b) avoid redevelopment, or change in land use, that would increase the risk of adverse effects from coastal hazards;
- (c) encourage redevelopment, or change in land use, where that would reduce the risk of adverse effects from coastal hazards, including managed retreat by relocation or removal of existing structures or their abandonment in extreme circumstances, and designing for relocatability or recoverability from hazard events;
- (d) encourage the location of infrastructure away from areas of hazard risk where practicable;
- (e) discourage hard protection structures and promote the use of alternatives to them, including natural defences; and
- (f) consider the potential effects of tsunamis and how to avoid or mitigate them.

	<p>Policy 27 Strategies for protecting significant existing development from coastal hazard risk</p> <p>(1) In areas of significant existing development likely to be affected by coastal hazards, the range of options for reducing coastal hazard risk that should be assessed includes:</p> <ul style="list-style-type: none"> <li>(a) promoting and identifying long-term sustainable risk reduction approaches including the relocation or removal of existing development or structures at risk;</li> <li>(b) identifying the consequences of potential strategic options relative to the option of 'do-nothing';</li> <li>(c) recognising that hard protection structures may be the only practical means to protect existing infrastructure of national or regional importance, to sustain the potential of built physical resources to meet the reasonably foreseeable needs of future generations;</li> <li>(d) recognising and considering the environmental and social costs of permitting hard protection structures to protect private property; and</li> <li>(e) identifying and planning for transition mechanisms and timeframes for moving to more sustainable approaches.</li> </ul> <p>(2) In evaluating options under (1):</p> <ul style="list-style-type: none"> <li>(a) focus on approaches to risk management that reduce the need for hard protection structures and similar engineering interventions;</li> </ul>
--	---

#### **4.4.2 Proposed National Policy Statements**

In addition to the five NPSs currently in force there are also two proposed NPSs under development, noting that these are yet to be issued and have no legal effect:

- Proposed NPS for Highly Productive Land
- Proposed NPS for Indigenous Biodiversity

The NPS for Highly Productive Land has no relevance to the Airport. The NPS for Indigenous Biodiversity has limited relevance. However, it is notable that settlement of the Airport designation appeals via consent order, included designation conditions that recognise the existence of some matagouri on the part of the Airport site.

#### **4.4.3 National Environmental Standards**

In addition to the NPSs there are nine National Environmental Standards (NES) currently in force:

- NES for Air Quality 2004
- NES for Sources of Human Drinking Water 2007
- NES for Electricity Transmission Activities 2009
- NES for Assessing and Managing Contaminants in Soil to Protect Human Health 2011

- NES for Telecommunication Facilities 2016
- NES for Plantation Forestry 2017
- NES for Freshwater 2020
- NES for Marine Aquaculture 2020
- NES for Storing Tyres Outdoors 2021

Because the Airport Zone is also a designation, section 43D RMA is relevant – describing the relationship between designations and national environmental standards. The current NES are older than the WIAL designations. For that reason, section 43D(4) is applicable, because: “A national environmental standard that exists when a designation is made prevails over the designation”.

Notwithstanding that general relevance of NES, the following standard and associated provisions of particular relevant to the Airport Zone are:

NES	Relevant Regulations
NES for Assessing and Managing Contaminants in Soil to Protect Human Health 2011	<p>There are over 30 hectares of land within the Airport Zone identified as HAIL land by the regional council. Those parts of the Airport are therefore subject to clause 5(7) of the NES as being “land covered” by the regulations, being:</p> <p>(7) The piece of land is a piece of land that is described by 1 of the following:</p> <p>(a) an activity or industry described in the HAIL is being undertaken on it:</p> <p>(b) an activity or industry described in the HAIL has been undertaken on it:</p> <p>(c) it is more likely than not that an activity or industry described in the HAIL is being or has been undertaken on it.</p>

No other NES are considered relevant. For completeness, note that the regional council is responsible for any resource consents required under the NES for Air Quality 2004. Regional consenting, including for air quality, is managed via the Proposed Natural Resources Plan (PNRP). The PNRP has no restrictions specific to air quality at Wellington Airport.

#### 4.4.4 National Planning Standards

The National Planning Standards provide for a range of zone options to be included in Part 3 – Area Specific Matters of the District Plan. This includes the Airport Zone, the purpose of which is as follows:

Zone	Description
Airport Zone	Areas used predominantly for the operation and development of airports and other aerodromes as well as operational areas and facilities, administrative, commercial and industrial activities associated with airports and other aerodromes.

The National Planning Standards also includes Mandatory Directions in relation to specified NZ Standards that address noise and vibration. Among those are: “New Zealand Standard

6805:1992 Airport noise management and land use planning” – but in relation to noise measurement only.

As noted by Standards NZ: “Standards are agreed specifications for products, processes, services, and performance. They are generally voluntary but can be mandatory when cited in Acts, regulations or other legislative instruments”.

The section 32 evaluation for the Noise Chapter covers sets out how noise has been identified as a qualifying matter for being less enabling of the medium density residential standards.

#### 4.5 National Guidance Documents

The following national guidance documents are considered relevant to this topic:

Document	Relevant provisions
Urban Design Protocol	<p>The Urban Design Protocol is a voluntary commitment by central and local government, property developers and investors, design professionals, educational institutes and other groups to undertake specific urban design initiatives.</p> <p>The Urban Design Protocol identifies seven essential design qualities that together create quality urban design:</p> <p>Context; Character; Choice; Connections; Creativity; Custodianship; and Collaboration</p> <p>WIAL’s designation covering the Main Site part of the Airport includes conditions related to urban design. The conditions include:</p> <ul style="list-style-type: none"> <li>• Developing an urban design principles and vision document for development in the Terminal Precinct. The draft document must be submitted to the council for comment.</li> <li>• Articulating a Vision focused on achieving a level of design excellence where relevant that reflects the Terminal Precinct’s role as part of a regionally significant infrastructure.</li> <li>• Developing a landscape and urban design statement for proposed works in of the Airport precincts. The LUDS must be consistent with the urban design principles and vision.</li> </ul>
<p>Guidance Material for Land Use at or Near Aerodromes</p> <p>(Civil Aviation Authority of NZ, June 2008)</p>	<p><u>Local Authority Zoning</u></p> <p>The Civil Aviation Authority (CAA) encourages local authorities to protect aerodromes / airports in their areas to ensure the long term sustainability of the aerodrome, the safety of the aircraft operations, and the safety of persons and property. In addition to the required obstacle limitation surfaces other areas can be specifically zoned to assure that future uses of the land are compatible with airport operations and to protect persons and property. Zoning solely to obstacle limitation surface is insufficient to prevent the construction of incompatible uses such as housing or uses that attract congregations of people in the approach areas.</p> <p><u>Noise Issues</u></p> <p>Noise issues to do with aerodromes / airports are the responsibility of the local controlling authority and the CAA does not have any statutory</p>

	<p>function in relation to aircraft or aerodrome noise. The Minister does produce rules relating to noise abatement measures under Civil Aviation Rule Part 93 which are published on behalf of the aerodrome operator from local authority requirements.</p> <p>Note: Noise is addressed in the proposed district plan Noise chapter, and related documents (e.g., section 32 evaluation for that chapter).</p>
--	--

#### 4.6 Regional Policy and Plans

##### Regional Policy Statement for the Wellington Region 2013 (RPS)

The table below identifies the relevant provisions and resource management topics for the Airport contained in the RPS.

<b>Energy, infrastructure and waste</b>	
<b>Section</b>	<b>Relevant matters</b>
<p>Objective 10</p> <p>The social, economic, cultural and environmental, benefits of regionally significant infrastructure are recognised and protected.</p>	<p>The RPS (Appendix 3) defines “regionally significant infrastructure” to include Wellington International Airport.</p> <p>Policy 7 (M) requires district plans to:</p> <ul style="list-style-type: none"> <li>Recognise the benefits from regionally significant infrastructure, including that people and goods can travel to, from and around the region efficiently and safely.</li> </ul> <p>Policy 8 (M) requires district plans to:</p> <ul style="list-style-type: none"> <li>Include policies and rules that protect regionally significant infrastructure from incompatible new subdivision, use and development occurring under, over, or adjacent to the infrastructure.</li> </ul> <p>When considering an application for a resource consent, notice of requirement, or review of a district plan, Policy 39 (R) requires particular regard to be had to:</p> <ul style="list-style-type: none"> <li>the social, economic, cultural and environmental benefits of regionally significant infrastructure; and</li> <li>protecting regionally significant infrastructure from incompatible subdivision, use and development occurring under, over, or adjacent to the infrastructure.</li> </ul>
	<p>Policy 51: Minimising the risks and consequences of natural hazards – consideration</p> <p>When considering an application for a resource consent, notice of requirement, or a change, variation or review to a district or regional plan, the risk and consequences of natural hazards on people, communities, their property and infrastructure shall be minimised, ...</p>
	<p>Policy 52: Minimising adverse effects of hazard mitigation measures – consideration</p>

	<p>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, for hazard mitigation measures, particular regard shall be given to:</p> <ul style="list-style-type: none"> <li>(a) the need for structural protection works or hard engineering methods;</li> <li>(b) whether non-structural or soft engineering methods are a more appropriate option;</li> <li>(c) avoiding structural protection works or hard engineering methods unless it is necessary to protect existing development or property from unacceptable risk and the works form part of a long-term hazard management strategy that represents the best practicable option for the future;</li> <li>(d) the cumulative effects of isolated structural protection works; and</li> <li>(e) residual risk remaining after mitigation works are in place, so that they reduce and do not increase the risks of natural hazards.</li> </ul>
	<p>Policy 54: Achieving the region’s urban design principles – consideration</p> <p>When considering an application for a notice of requirement, or a change, variation or review of a district or regional plan, for development, particular regard shall be given to achieving the region’s urban design principles in Appendix 2.</p> <p>The region’s urban design principles seek to ensure developments, including <i>infrastructure</i>, consider the following design elements:</p>
	<p>Policy 57: Integrating land use and transportation – consideration</p> <p>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, for subdivision, use or development, particular regard shall be given to the following matters, in making progress towards achieving the key outcomes of the Wellington Regional Land Transport Strategy:</p>
	<p>Policy 67: Maintaining and enhancing a compact, well designed and sustainable regional form – non-regulatory</p> <p>To maintain and enhance a compact, well designed and sustainable regional form by:</p> <ul style="list-style-type: none"> <li>(e) implementing the actions in the Wellington Regional Strategy for the Regional Focus Areas</li> </ul>
	<p>Policy 32: Identifying and protecting key industrial-based employment locations – district plans</p> <p>District plans should include policies, rules and/or methods that identify and protect key industrial-based employment locations where they maintain and enhance a compact, well designed and sustainable regional form.</p>

*M = policies which must be implemented in accordance with stated methods in the RPS*

*R = policies to which particular regard must be had when varying a district plan*

Note: RPS Policy 9 is “Reducing the use and consumption of non-renewable transport fuels and carbon dioxide emissions from transportation”. However, this is specific to the Regional Land Transport Study and therefore not relevant to the Airport.

## Regional Plans

There are currently five operative regional plans and one proposed regional plan for the Wellington region:

- Regional Freshwater Plan for the Wellington Region, 1999
- Regional Coastal Plan for the Wellington Region, 2000
- Regional Air Quality Management Plan for the Wellington Region, 2000
- Regional Soil Plan for the Wellington Region, 2000
- Regional Plan for discharges to the land, 1999
- Proposed Natural Resources Plan, appeals version 2021

The proposed Natural Resources Plan (PNRP) replaces the five operative regional plans, with provisions in this plan now largely operative with the exception of those that are subject to appeal.

The table below identifies the relevant provisions for the Airport contained in the Regional Coastal Plan. Note that provisions related to the coastal marine area are provided for completeness of context, rather than for direct relevance. The district plan Airport Zone does not directly abut the CMA at any point and makes no provision for expansion of the Airport (via reclamation) into the CMA.

<b>Regional Coastal Plan</b>	
<b>Section</b>	<b>Relevant matters</b>
Map 7	Height Restrictions in the Coastal Marine Area – Wellington International Airport
Policy 4.2.6	To recognise the importance of the coastal marine area as a place for the safe and convenient navigation of ships and aircraft, and to protect these activities from inappropriate use and development.
Policy 5.2.3	To not allow reclamation or draining of any foreshore or seabed if there are practicable alternatives, either within or outside of the coastal marine area, which, on balance, have less significant adverse effects on the environment.
Policy 5.2.4	Subject to Policy 5.2.3, to allow reclamation of the foreshore or seabed only if the reclamation is required for one or more of the following purposes: <ul style="list-style-type: none"> <li>• airport or seaport purposes;</li> </ul>
Policy 6.2.3	To discourage the development of ad hoc shore protection structures; and to not allow the development of seawalls, groynes, or other "hard" shore protection structures unless all feasible alternatives have been evaluated and found to be impracticable or to have greater adverse effects on the environment.



Policy 6.2.10	To protect the flight approach path for Wellington International Airport and Paraparaumu Airport, and the float plane landing area and flight approach path at Porirua Harbour by ensuring that no new structure: <ul style="list-style-type: none"> <li>• infringes the Wellington International Airport Height Restrictions as generally indicated on Planning Map 7 in appendix 7;</li> </ul>
<b>Proposed Natural Resources Plan</b>	
<b>Section</b>	<b>Relevant matters</b>
Rule R52	Stormwater from a port or airport – restricted discretionary activity  The discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through a local authority stormwater network, from a port or airport is a restricted discretionary activity.
Rule R3	Outdoor burning for firefighter training – permitted activity  The discharge of contaminants into air from the burning of a building, specified materials, vegetation and fuels for the purpose of firefighter training or research is a permitted activity, provided the following conditions are met:  (b) the fire shall be under the control of Fire and Emergency New Zealand, Department of Conservation, New Zealand Defence Force, any airport fire service or other industry brigade, or any other nationally recognised body authorised to undertake firefighting research or fire training activities, and
Rule R149	Maintenance or repair of structures – permitted activity  The maintenance or repair of a structure in the coastal marine area, including any associated:  (a) occupation of space in the common marine and coastal area, and (b) disturbance of the foreshore or seabed, and (c) deposition in, on or under the foreshore or seabed, and (d) discharge of contaminants, and (e) diversion of open coastal water
Rule R158	Structures in airport height restriction areas or navigation protection areas for airport/navigation purposes – discretionary activity  The placement of a new structure including a temporary structure or addition or alteration to a structure and the associated use of the structure:  (b) within an airport height restriction area shown on Map 50 or Map 51,

#### 4.7 Iwi Management Plan(s)

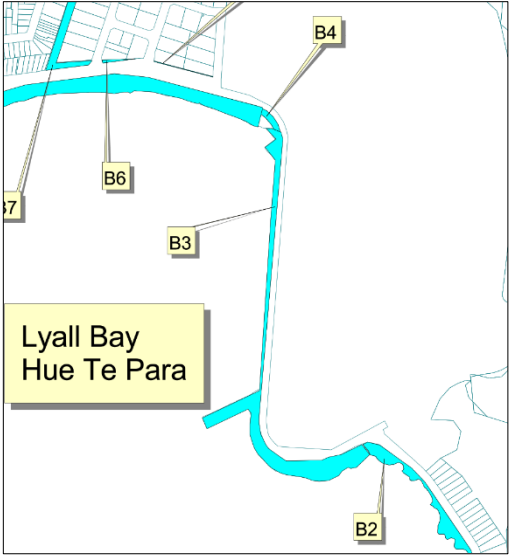
There are no Iwi Management Plans relevant to this topic.

## 4.8 Relevant plans or strategies

The following plans / strategies are relevant to this topic:

Plan / Strategy	Organisation	Relevant Provisions
WLG 2040 (Wellington International Airport Masterplan) <a href="#">Link</a>	WIAL (2021)	The Masterplan is WIAL’s blueprint for spatial and operational outcomes at the Airport up to 2040. It is based on and contains information about anticipated air traffic growth, and also indicates WIAL’s intentions with regard to the management of carbon emissions. Spatially, it reflects outcomes sought via the various Airport designations.
Te Atakura – First to Zero <a href="#">Link</a>	WCC (2019)	This Council document focusses on making Wellington City a zero carbon capital (net zero emissions) by 2050. One of the four target areas is transport. The Airport is included as a ‘case study’ and ‘critical actor’ – although Te Atakura acknowledges that emissions in getting there are “rightfully” not included in the Airport’s emissions inventory. Allowing for alternatives other than petrol driven private cars to access the Airport are acknowledged as either underway or are future opportunities.
Wellington Regional Land Transport Plan <a href="#">Link</a>	GWRC (2021)	<p>3.4: Investment Priority 3 is to improve access to key regional designations, such as ... airports ... for people and freight.</p> <p>3.4.2: WIAL is acknowledged as a key investment partner</p> <p>A.4.4.1: Key transport issues include network congestion and its impact on freight. Regarding the Airport, it is noted that the time-critical nature of air-freighted goods means that effective and reliable road access to the airport for freight is important.</p> <p>The RLTP sets the direction for the Region’s transport network for the next 10 to 30 years. The RLTP is required to be consistent with the Government Policy Statement. It outlines the region’s long-term vision, identifies regional priorities and sets out the transport projects proposed for investment over the next six years. The RLTP identifies ambitious targets to be achieved over the next ten years, including of particular relevance to the Airport:</p> <ul style="list-style-type: none"> <li>• A 40% increase in active mode and public transport travel; and</li> <li>• A 30% reduction in carbon emissions.</li> </ul> <p>The Airport is a significant generator of traffic (and associated emissions) but only a small percentage</p>

		<p>of journeys to and from the Airport involve high capacity public transport, e.g., bus or rail. The RLTP is relevant, especially the achievement of its strategic priority of “an efficient, accessible and low carbon public transport network” achieved through mode shift, decarbonisation of the public transport fleet and improving customer experience.</p>
<p>Wellington Regional Growth Framework</p> <p><a href="#">Link</a></p>	<p>Local and central govt., and iwi in the Wellington-Horowhenua region</p>	<p>The WRGF is a collaboratively developed spatial plan, intended to provide Councils and iwi in the region with an agreed regional direction for growth and investment, and to deliver on the Urban Growth Agenda objectives of the Government.</p> <p>It is not a Future Development Strategy as required under the National Policy Statement on Urban Development (NPS-UD). However, it has been developed with this in mind and with the expectation that the next iteration of the Framework will meet the NPS-UD requirements.</p> <p>The WRGF identifies the route to the Airport as a national high volume road, being part of the strategic road network connecting key regional destinations and links to regional centres.</p> <p>In developing the draft WRGF, numerous ideas for change arose but were not included for varying reasons, including that they would likely not be feasible. One such idea was moving the Airport. The concept was raised in workshops as an idea to find a location that was less exposed to concerns around climate change and sea level rise as well as other natural hazards. However, a conclusion was reached that the idea was not expected to be either practical or feasible.</p>
<p>Let’s Get Wellington Moving – Recommended Programme of Investment</p>	<p>LGWM / Waka Kotahi</p>	<p>The existence of the Airport, the traffic it generates, and the associated effects are one of the drivers for projects associated with the Let’s Get Wellington Moving (LGWM) programme.</p> <p>All of the four Options identified by the LGWM programme include a bus route to the Airport, being either a rapid transit or priority system. No option includes light rail to the Airport. Light rail is identified in Options 1, 3 and 4 – but only to Island Bay. Resource consents, or designation for the mass transit system, are the most likely means of enabling the activity.</p> <p>Decisions about a bus rapid mass transit route under the LGWM programme will certainly impact on outcomes within the Airport Zone. Potential outcomes are that the project is subject to enabling</p>

		<p>legislation; or is designated; or is given effect via a resource consent.</p> <p>None of the options indicate a bus route beneath the Airport. The efficient operation of the Airport transit terminal, and questions of urban design will need to be addressed.</p>
Various Other Documents	WCC / LGWM	<p>Various documents acknowledge the existence of the Airport and its role as a significant destination or strategic infrastructure in the economy and life of the City and the region, as well associated issues.</p> <ul style="list-style-type: none"> <li>Wellington City Council Draft Financial and Infrastructure Strategy 2021-51</li> <li>Wellington Regional Housing and Business Development Capacity Assessment 2019</li> <li>Wellington Towards 2040: Smart Capital</li> <li>Wellington Spatial Plan 2021</li> </ul>
South Coast Management Plan <a href="#">Link</a>	WCC	<p>The sites referred to below are adjacent to, but outside of, the Airport Zone.</p> <p>“5.1 – An area based approach</p> <p>“Site B2 – Moa Point Road</p> <p>This site has a strong natural coast character. A coastal trail provides access through the area and new structures will not be encouraged. While there are a number of houses in the location, the site does not have a significant urban character.</p> <p>“Site B3 – Moa Point Road</p> <p>The key function of this area of land is to provide erosion protection – predominantly for the coastal road and airport. Equipment for the operation of the airport is permitted in this area, as are operations to maintain the seawalls in this high impact coastal environment.</p> <p>“6.5 – Safety</p> <p>In the area near the airport (sites B3, B4 and the eastern end of B5) signs warning of the hazard presented by aircraft, or for the safety of aircraft (for example, highlighting the risk of bird strike), are appropriate.</p> <p>“6.7.2 – Seawall erosion control</p> <p>The Airport Company is responsible for the maintenance of the seawall adjacent to the airport on Moa Point Road and the breakwater extending into Lyall Bay.</p>
		

	<p><u>Implementation</u></p> <p>All projects with more than a minor effect on the coast should be discussed by, and planned in association with, the Council’s land manager, the relevant infrastructure manager and the local community.</p> <p>“5.4.3 – Further Airport Development</p> <p>This Management Plan does not explicitly provide for, or oppose, the future development of the Wellington International Airport. If the runway was extended to the south it would have impacts on the coastal and marine environments. These impacts will need to be considered in relation to the benefits associated with such a project. The determination of any airport extension project will occur through the resource consent process (under regional and local policies and plans).”</p>
--	---

#### 4.9 Other relevant legislation or regulations

The following additional legislative / regulatory requirements are also relevant to this topic:

Legislation / Regulation	Relevant Provisions
Civil Aviation Rules	The Civil Aviation Rules are set and administered by the CAA. They are a comprehensive body of rules covering all aspects of an airport’s operation. Of particular relevance to the district plan are provisions related to obstacle limitation surfaces (OLS) and runway end safety (RESA) areas in Part 139 of the Civil Aviation Rules. OLS and RESA, are a requirement of an airport’s operator certificate (granted by CAA) and are typically included in district plans through mapping or designations.
Resource Management Act 1991	Under the Resource Management Amendment Act 2020, sections 17 to 21, 35, and 36, came into force on 31 December 2021. In effect, this repeals sections 70A / 70B and 104E /104F of the RMA, removing restrictions that applied to considering discharges of greenhouse gas emissions. However, the discharges covered by those sections of the Act are limited to discharges that are (or can be) covered by regional plan rules.  Aviation emissions are not covered by any of the regional plans.

## 5.0 Resource Management Issues Analysis

### 5.1 Background

The Airport and Golf Course Recreation Precinct separates the activities of Wellington Airport and the Miramar Golf Course into two distinct areas; the Airport area, and the Golf Course recreation area. The Airport area is divided into five sub-areas being: Terminal; Rongotai Ridge; Broadway; South Coast; and West Side.

The relevant provisions are in chapters 10 and 11 of the ODP. The Airport and Golf Course are also subject to district provisions. Of particular relevance are the earthworks, designation and contaminated land chapters.

The ODP provisions recognise the strategic importance of the Airport by providing for its continued use and development. The ODP provisions also provide for activities that are ancillary to this primary function. These activities include runways, taxiways, terminals, air carrier facilities, fuel storage, refuelling operations, and aircraft maintenance, as well as a number of support and commercial activities associated with the airport.

The provisions of the Golf Course recreation area provide for the continued use of the existing<sup>5</sup> Miramar Golf Course and recreational activities.

There are also rules relating to residential or other noise sensitive development near the airport (inside the Air Noise Boundary) to recognise the potential effects of airport noise and the potential constraints of such activities and developments on the airport.

There are several ODP designations associated with or otherwise within the Airport Precinct, but their geographic extent is not necessarily limited to within the boundaries of the Airport Precinct.

The ODP Precinct provisions have not been amended since being put in place via the 1999 district plan review. At that time WIAL had been persuaded by the Council to give up designation as a means of protecting its interests in the land, and to rely on the Precinct provisions. Prior to the 1999 district plan review, the Airport designation also included land around Moa Point Road.

The ODP Precinct provisions provide for most, but not all the Airport's activities. Activities are also subject to performance standards. WIAL considered the ODP Precinct provisions to be unnecessarily constraining, having to seek resource consents for minor exceedances of standards. The Airport company noted that this can lead to significant delays when undertaking critical works and other projects at the Airport site, as well as additional costs (by comparison with what could be achieved under a designation).

For those reasons, WIAL has sought and obtained designations over the existing Airport, and over the East Side Area (southern part of Miramar golf course) for future expansion of aircraft standing / taxiing.

## 5.2 Evidence Base - Research, Consultation, Information and Analysis undertaken

The Council has reviewed the operative District Plan, commissioned technical advice and assistance from various internal and external experts and utilised this, along with internal workshops and community feedback to assist with setting the plan framework. This work has been used to inform the identification and assessment of the environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions. This advice includes the following:

Title	Author	Brief synopsis
Issues and Options Report – April 2021	4Sight Consulting	The report reviews relevant planning and strategic issues related to the Operative District Plan Airport and Golf Course Precinct and its

<sup>5</sup> Note that the southern half of the golf course is now designated for expansion of the Airport

		constituent parts. It also sets out options for how the Airport and Golf Course can be managed under the proposed District Plan.
Various: Internal and external advice in relation to the Main Site, East Side, and Miramar South NoRs / designations – 2019 to 2021	WCC technical staff and external experts	Reviews / advice were completed in relation to noise, traffic, construction / earthworks, landscape and urban design, lighting, and legal. These assessments were used in relation to further information requests for the notices of requirement, and the preparation of hearing evidence.
Airport and Golf Course Precinct and Air Noise Boundary; Monitoring and Evaluation Report – August 2019	Wellington City Council	This report presents the findings of a review of resource consent data in relation to the Airport Precinct and the Airport Noise Boundary of the Operative Wellington City District Plan. It is based on a review of resource consent data from 21 November 2009 (when Plan Change 57 became operative) to 09 August 2019. The data includes resource consents within the Airport and Golf Precinct, and also within the Air Noise Boundary area.
Analysis of Airport and Golf Course Precinct provisions – April 2012	Wellington City Council	This early draft document provides a general look at consents, district plan provisions, and possible information gaps.

In addition to the material listed in the table above, the Council has also gathered the following information and advice that is relevant to this topic:

- District Plan Maps – relevant to existing designations and the air noise boundary
- Legal decisions on development at other airports
- Proposed Natural Resource Plan (PNRP) provisions, submissions and appeals relevant to Wellington Airport
- Planning for Growth – Issues and Opportunities Report, April 2019
- GWRC – Selected Land Use Register (SLUR)
- Let's Get Wellington Moving background reports / information
- Notice of Requirement documentation, including expert reports and hearing evidence prepared by WIAL and its advisors.
- Submissions and hearing evidence provided by third parties during the notice of requirement process.

### **5.2.1 Analysis of Operative District Plan provisions relevant to this topic**

Until immediately before notification of the Proposed District Plan, the main part of the Airport was not designated. However, other parts of the Airport or its associated operations that were already designated were:

- Runway End Safety Area (RESA) at the southern end of the runway (designation G3)
- Airspace, including take off and approach fans, transitional side and horizontal surfaces, and the instrument circling area (designation G2)

- Control Tower height restrictions, to preserve visibility (designation A2)
- Miramar South, for flight catering, rental car operations, and freight operations (designation G4)

In addition to the designations cited above, for the purposes of this report the key provisions in the Operative Wellington District Plan of relevance to this topic are summarised below.

Topic	Summary of relevant provisions
Airport and Golf Course Precinct	<p>Chapter 10 has eight objectives which broadly seek the following:</p> <ul style="list-style-type: none"> <li>• Safe and effective airport operation</li> <li>• Continued use of the golf course for that purpose</li> <li>• Allowance of non-airport activities</li> <li>• Protection of the airport from inappropriate non-airport development</li> <li>• Protection of surrounding and internal amenity</li> <li>• Management of signage</li> <li>• Management of hazardous substances</li> <li>• Management of natural hazards</li> </ul> <p>These objectives are implemented by a framework of thirty two supporting policies intended to achieve the objectives. The most notable of these relate to:</p> <ul style="list-style-type: none"> <li>• Ensuring the airport’s strategic national, regional and local transport role is not compromised</li> <li>• Integration with the surrounding environment, in terms of adverse effects and amenity</li> <li>• Ensuring retail in the Precinct does not detract from other retail in the city</li> <li>• Permissive development within the Terminal area</li> <li>• Limiting adverse effects on Rongotai Ridge, with respect to visual amenity and landform</li> <li>• Strengthening the Broadway area as a ‘gateway’ location</li> <li>• Allowing development while protecting and enhancing the character of the south coast</li> <li>• Allowing retail in the West Side area of the airport (Tirangi Road Retail Park)</li> <li>• Controlling building form and location</li> <li>• Retaining a buffer of recreational land to the east of the airport</li> <li>• Managing noise to maintain community health</li> <li>• Ensuring that high hazard risk areas are not occupied or developed for vulnerable uses</li> </ul> <p>For the Precinct, rules and standards relating to land use activities, buildings, signs, subdivision, earthworks, heritage, utilities, contaminated sites are co-located in Chapter 11. Typically, any activity identified in the associated rule table and/or complies with the permitted activity standards is permitted, with exceptions to being:</p> <ul style="list-style-type: none"> <li>• Non-airport activities, which are either controlled, restricted, or fully discretionary depending on location within the overall Precinct.</li> </ul> <p>Key activity and building and structure standards include:</p>



Topic	Summary of relevant provisions
	<ul style="list-style-type: none"> <li>• Noise controls – largely reflecting the approach and measures set out by NZS 6805:1992 – <i>Airport Noise Management and Land Use Planning</i></li> <li>• Vehicle parking – detailed standards for the rates at which parking must be provided</li> <li>• Maximum heights in various parts of the Precinct, and related controls for height in relation to boundaries</li> <li>• Design considerations in the Terminal area</li> <li>• Various controls on earthworks, sighting, signage, and landscape design</li> <li>• Hazardous substances</li> </ul> <p>During the course of reviewing the operative provisions for the purposes of this report, several key issues were identified. These include:</p> <ul style="list-style-type: none"> <li>• To meet the requirements of the National Planning Standards, the need to address the following matters in separate chapters: <ul style="list-style-type: none"> <li>○ Noise</li> <li>○ Golf course</li> </ul> </li> <li>• The need to account for new designations, which have been confirmed by via a consent order between appellant parties and approved by the Environment Court. The new designations are: <ul style="list-style-type: none"> <li>○ Main Site Area – covering bulk of the existing airport, but excluding the Rongotai Ridge area</li> <li>○ East Side Area – a new area of land to the east of the existing airport, on the southern part of the Miramar golf course. This land provides for future expansion of taxiing / aircraft parking.</li> </ul> </li> <li>• The need to account for the designation of the old Miramar school site, for use by various Airport services. This land was designated in late 2020, without any appeal.</li> <li>• How to either give effect to the Medium Density Residential Standards within land affected by airport noise, or otherwise restrict such development as a qualifying matter. This issue is addressed in the Proposed District Plan Noise chapter (and associated s32 report).</li> </ul>

### 5.2.2 Advice received from Taranaki Whānui and Ngāti Toa Rangatira

Under Clause 4A of Schedule 1 of the RMA local authorities are required to:

- Provide a copy of any draft policy statement or plan to any iwi authority previously consulted under clause 3 of Schedule 1 prior to notification;
- Allow adequate time and opportunity for those iwi authorities to consider the draft and to supply advice; and
- Have particular regard to any advice received before notifying the plan.

As an extension of this, s32(4A) requires evaluation reports prepared in relation to a proposed plan to include a summary of:

- All advice received from iwi authorities concerning the proposal; and
- The response to that advice, including any proposed provisions intended to give effect to the advice.

The District Plan Review has included significant engagement with our mana whenua partners - Taranaki Whānui ki te Upoko o te Ika and Ngāti Toa Rangatira. This has included over 100 hui and wānanga attended by Council officers over the last 12 months. This has provided a much greater understanding of mana whenua values and aspirations as they relate to the PDP.

The PDP elevates the consideration of mana whenua values in resource management processes, including:

- A new Tangata Whenua chapter which provides context and clarity about who mana whenua are and what environmental outcomes they are seeking.
- A new Sites and Areas of Significance to Māori chapter that provides greater protection for sites and areas of significance than the current District Plan.
- Integrating mana whenua values across the remainder of the plan where relevant.

This is consistent with both the City Goal of ‘Partnership with mana whenua’ in the Spatial Plan; and the recently signed Tākai Here (2022), which is the new partnership agreement between the Council and our mana whenua partners, Rūnanga o Toa Rangatira, Taranaki Whānui ki Te Upoko o Te Ika and Te Rūnanganui o Te Āti Awa.

A full copy of the advice received is attached as an addendum to the complete suite of Section 32 reports as Addendum A – Advice received from Taranaki Whānui and Ngāti Toa Rangatira.

No specific advice has been received from Taranaki Whānui/Ngāti Toa Rangatira regarding this topic and the proposed provisions evaluated within this report. It is also noted that no evidence of consultation with iwi was presented at the notices of requirement hearing, or in the notices of requirement themselves. Iwi were not a submitter on the notices of requirement.

### 5.2.3 Consultation undertaken to date

The following table summarises the primary consultation undertaken in respect of this topic. Note that much consultation can be considered to have occurred via the notices of requirement issued by WIAL, and the subsequent processes that led to the designations being confirmed, after resolution of appeals through mediation directed by the Environment Court. Council staff were fully engaged in those processes and therefore aware of the objectives of the Airport company (WIAL), the wide range of issues associated with the existence and future development of the Airport, and the range of community views expressed on those matters.

Who	What	When	Relevant Issues Raised
General Public	Notices of requirement for designation  NoR hearing (May 2021)  Appeal / mediation of designations by third parties	Dec 2020 – June 2022	<ul style="list-style-type: none"> <li>• All issues associated with the operation and future growth of the Airport</li> </ul>
Councillors	Draft Plan workshops	11/12/ 2020  30/8/2021  12/4/2022	<ul style="list-style-type: none"> <li>• WIAL masterplan</li> <li>• Management of Airport noise</li> <li>• Airport precincts</li> </ul>

		17/6/2022	<ul style="list-style-type: none"> <li>• Notices of requirement/ designations</li> <li>• NoR appeals and mediation</li> </ul>
WIAL	Designations, draft plan, appeal / mediation of designations by third parties	Dec 2017 – June 2022	<ul style="list-style-type: none"> <li>• All issues associated with the operation and future growth of the Airport</li> <li>• Structure of the Airport chapter and relationship of provisions to the designations</li> </ul>
Landowners	<p>Notices of requirement for designation</p> <p>NoR hearing (May 2021)</p> <p>Appeal / mediation of designations by third parties</p>	Dec 2020 – June 2022	<ul style="list-style-type: none"> <li>• All issues associated with the operation and future growth of the Airport</li> </ul>
Feedback on Draft Plan	Feedback on Draft Plan, through submissions and targeted discussions	xxx	<ul style="list-style-type: none"> <li>• All issues associated with the operation and future growth of the Airport</li> <li>• Structure of the Airport chapter and relationship of provisions to the designations</li> </ul>

A summary of specific feedback on this topic received during consultation on the Draft District Plan is contained in Appendix , including how it has been responded to in the Proposed District Plan. Additional detail concerning the wider consultation undertaken in preparing the Proposed District Plan is contained in the companion Section 32 Evaluation Overview Report.

In summary, the key findings arising from the consultation undertaken on this topic are:

- Aircraft noise is a significant issue for the community
- Climate change issues (arising from carbon based jet fuel) need to be addressed
- The status of the Airport as regionally significant infrastructure needs to be recognised and protected
- Unrestricted parking (by air travellers) in nearby neighbourhoods has created issues
- The built environment (and associated effects) created by the Airport needs to be addressed, especially in key visual locations such as ‘gateway’ areas

### 5.3 Summary of Relevant Resource Management Issues

Based on the research, analysis and consultation outlined above the following issues have been identified:

Issue	Comment	Response
Issue 1: Significant Infrastructure	<ul style="list-style-type: none"> <li>The Airport is a major contributor to the economic life of the city and region.</li> <li>The Wellington Regional Policy Statement recognises the Airport as regionally significant infrastructure.</li> </ul>	<ul style="list-style-type: none"> <li>Inclusion of an objective to recognise and protect the Airport as regionally significant infrastructure.</li> <li>Policies, rules and standards that are permissive of structures and activities related to the purpose of the Airport (which also is consistent with the Airport's designations).</li> <li>Policies, rules and standards that are generally accepting of Airport related structures and activities, being those that support the primary purpose of the Airport but are undertaken by third parties (i.e., not by WIAL).</li> </ul>
Issue 2: Climate Change	<ul style="list-style-type: none"> <li>The Airport chapter does not restrict growth in air traffic. Modelled growth is expected to be substantial over the next 30 years.</li> <li>Air traffic growth via 'business as usual' for the use of CO<sub>2</sub> emitting jet fuels, will contribute to the causes of climate change.</li> </ul>	<ul style="list-style-type: none"> <li>Inclusion of a 'carbon neutrality' objective for the Airport Zone.</li> <li>Inclusion of a policy that includes measuring, reporting and pursuing decarbonisation – including embedded emissions from construction and activity (such as transport) attracted by the Airport.</li> </ul>
Issue 3: Air Quality	<ul style="list-style-type: none"> <li>Air quality, arising from discharges to air associated with burning of jet fuel, has been raised by some parties as a public health issue.</li> </ul>	<ul style="list-style-type: none"> <li>RMA section 15 controls discharges to air, but only in relation to discharges from industrial and trade premises. An Airport is not an industrial or trade premise. The National Environmental Standards for Air Quality (2004) exclude the application of the standards (specifically regulation 10) from applying to exhaust pipe emissions.</li> <li>The regional council has RMA regulatory responsibility for air discharges. Airport emissions, with respect to air quality management, are a permitted activity under the PNRP (Rule 33).</li> <li>The city council does not have regulatory authority for air quality, and</li> </ul>

Issue	Comment	Response
		there is no scope to include this under the district plan.
<p>Issue 4:</p> <p>Land Transport</p>	<ul style="list-style-type: none"> <li>• The Airport is a destination for substantial traffic volumes. Pre-Covid there were 16,000 to 17,000 daily car trips to and from the Airport via Cobham Drive.</li> <li>• Adverse effects of street-side parking by Airport users in nearby neighbourhoods has been an ongoing issue.</li> <li>• The Airport is identified as a major traffic destination by the Let's Get Wellington Moving programme (but not as a destination for light rail).</li> </ul>	<ul style="list-style-type: none"> <li>• The relationship between the Airport, and public and private land transport, is recognised in various objectives, policies, and assessment criteria of the Airport chapter. The Airport is recognised as a land transport hub.</li> <li>• These provisions variously seek: safe and efficient movement of people and goods; efficient and integrated functioning of transport networks; significant growth in low-carbon land transport; and the resilience of transport links.</li> <li>• The proposed district plan does not include parking standards for the Airport.</li> <li>• The Airport's designation requires it to report to council, on an annual basis, the current status of parking demand, supply, and management. It also requires WIAL to identify practicable actions or strategies to reduce airport related car parking effects occurring beyond the designation (Airport Zone).</li> </ul>
<p>Issue 5:</p> <p>Noise</p>	<ul style="list-style-type: none"> <li>• Airport noise is a significant environmental effect and is experienced well beyond the boundaries of the Airport. It can have a substantial effect on residential quality of life.</li> </ul>	<ul style="list-style-type: none"> <li>• The National Planning Standards require noise to be addressed through a separate district plan chapter.</li> <li>• Airport noise is addressed by the Noise chapter and through mapped Air Noise overlays. The approach to noise management is consistent with the relevant NZ Standard and similar to that taken by the operative district plan.</li> <li>• Airport noise has been identified as a qualifying matter that modifies application of the Medium Density Residential Standards.</li> </ul>
<p>Issue 6:</p>	<ul style="list-style-type: none"> <li>• The Airport chapter enables Airport change and growth. There will be associated built</li> </ul>	<ul style="list-style-type: none"> <li>• Design, amenity, character and landscape considerations feature in a</li> </ul>

<b>Issue</b>	<b>Comment</b>	<b>Response</b>
Urban Design and Visual Effects	<p>outcomes, such as Terminal expansion or the addition of new hangars.</p> <ul style="list-style-type: none"> <li>• Airport buildings, both individually and as a group, have a high degree of visibility. As a 'gateway' to the city, the Airport influences impressions that visitors have of Wellington.</li> <li>• The height and bulk of some existing or potential future buildings means that their effects are significant.</li> </ul>	<p>mix of objectives, policies, rules and standards.</p> <ul style="list-style-type: none"> <li>• There is a focus on managing building scale and location, especially in relation to development near the Airport zone's external boundaries.</li> <li>• The 'gateway' role of precincts at the north and south ends of the Airport are recognised.</li> </ul>

## 6.0 Evaluation of the Proposal

This section of the report evaluates the objectives of the proposal to determine whether they are the most appropriate means to achieve the purpose of the RMA, as well as the associated policies, rules and standards relative to these objectives. It also assesses the level of detail required for the purposes of this evaluation, including the nature and extent to which the benefits and costs of the proposal have been quantified.

### 6.1 Scale and Significance

Section 32(1)(c) of the RMA requires that this report contain a level of detail that corresponds with the scale and significance of the environmental, economic, social and cultural effects that are anticipated from the implementation of the proposal.

The level of detail undertaken for this evaluation has been determined by assessing the scale and significance of the environmental, economic, social and cultural effects anticipated through introducing and implementing the proposed provisions (i.e. objectives, policies and rules) relative to a series of key criteria.

Based on this the scale and significance of anticipated effects associated with this proposal are identified below:

<b>Criteria</b>	<b>Scale/Significance</b>			<b>Comment</b>
	<b>Low</b>	<b>Medium</b>	<b>High</b>	
Basis for change		✓		<ul style="list-style-type: none"> <li>• Airport identified as regionally significant by RPS</li> <li>• Airport has recently been designated, with conditions that manage significant aspects of operation and development.</li> </ul>

Criteria	Scale/Significance			Comment
	Low	Medium	High	
				<ul style="list-style-type: none"> <li>Where relevant, the Airport chapter should complement the direction taken by the designations</li> </ul>
Addresses a resource management issue			✓	<ul style="list-style-type: none"> <li>The Airport is significant to Wellington in terms of its employment and economic impacts.</li> <li>Has a range of potentially adverse effects associated with operation and growth</li> </ul>
Degree of shift from the status quo		✓		<ul style="list-style-type: none"> <li>Proposed provisions are broadly similar to operative</li> <li>Designations are new, which influences the approach taken by the underlying provisions</li> </ul>
Who and how many will be affected/ geographical scale of effect/s			✓	<ul style="list-style-type: none"> <li>Expansion of Airport Zone onto south of Miramar golf course will affect adjacent residents</li> <li>Miramar South designation / Airport Zone affects adjacent residents in Miro / Kedah / Kauri streets</li> <li>Noise affects significant number of people / properties but this is actually less than allowed for under the operative Air Noise Boundary, due to changes in aircraft technology</li> <li>General impacts arising from land transport traffic growth in response to air traffic growth</li> <li>Note that all effects have been recently canvassed in public notice of requirement / designation processes, with agreed designation conditions now in effect</li> </ul>
Degree of impact on or interest from iwi/ Māori	✓			<ul style="list-style-type: none"> <li>No impact identified</li> </ul>
Timing and duration of effect/s		✓		<ul style="list-style-type: none"> <li>Impacts of Airport growth are long term and ongoing, but greatest impact is noise (addressed in Noise chapter s32 evaluation)</li> <li>Effects are primarily on people and communities and include both positive</li> </ul>

Criteria	Scale/Significance			Comment
	Low	Medium	High	
				(economic) and negative (environmental) effects
Type of effect/s		✓		<ul style="list-style-type: none"> <li>• Climate change (carbon based aircraft fuels)</li> <li>• Land based traffic attracted to Airport</li> <li>• Noise (addressed via Noise chapter)</li> <li>• Urban design</li> </ul>
Degree of risk and uncertainty		✓		<ul style="list-style-type: none"> <li>• Uncertain ability of activities at the airport to achieve meaningful carbon reductions</li> <li>• Uncertain ability of transport management projects (e.g., LGWM) to appropriately manage growth in land based traffic to Airport</li> <li>• Good certainty around future noise levels, but this is addressed in Noise chapter s32 evaluation</li> <li>• Relatively low community risk due to agreed designation conditions having been recently put in place</li> </ul>

Overall, the scale and significance of the proposed provisions are considered to be medium for the following reasons:

- Most criteria are rated as “medium”, as effects already exist (although some will continue to grow in scale / intensity).
- “High” impact for people / locations affected reflects grow of the Airport Zone in two locations. However, both areas of growth have been confirmed via designations, so their influence on the overall rating of “medium” is of lesser significance.
- The status of the Airport as regionally significant infrastructure is an overlying influence on the significance of the Zone and the s32 evaluation.

Consequently, a detailed evaluation of these provisions has been identified as appropriate for the purposes of this report.

## 6.2 Quantification of Benefits and Costs

Specific quantification of the benefits and costs beyond the information and evidence outlined in section 5.2 of this report is neither practicable nor readily available. However, a partly qualitative assessment of identifiable costs and benefits associated with this proposal is provided below and, where relevant, in the assessment of policies, rules and other methods contained in section 11 of this report.

In an average (pre-Covid) year, the Airport generated six million air passenger journeys from a Wellington region resident population in the approximately 500,000. Wellington Airport provides the connectivity which the city and region needs to ensure that it continues to thrive in both economic and social terms.



Pre-Covid, an economic impact assessment (EIA) undertaken by Business and Economic Research Limited (BERL) as part of the 2040 Master planning found that in 2018 the activity enabled by the airport contributed \$1.1B in GDP to the region per annum, directly and indirectly supporting 11,000 Full Time Equivalents (FTEs). In addition to the 107 FTEs employed by the airport itself, there were 77 individual businesses operating at the airport campus from airlines to ground handlers, restaurants to rental cars and many highly skilled technical support services, directly supporting 1,342 FTEs (with a further 1,422 FTEs supported indirectly).

Looking forward, an economic impact study undertaken by BERL predicts that by 2040, the airport will make a direct contribution to the region of \$4.3 billion per year, generating \$2.1 billion of GDP and facilitating more than 22,500 jobs.

The airport is recognised as a lifeline utility in the Civil Defence and Emergency Management Act 2002 and is a member of the Wellington Lifelines Group. In the event of a significant earthquake or other hazard event, the airport is recognised as potentially the only link between the city and the rest of the country given the vulnerability of the road and rail network and the potential for the port and harbour access to be affected by liquefaction.

## 7.0 Zone Framework

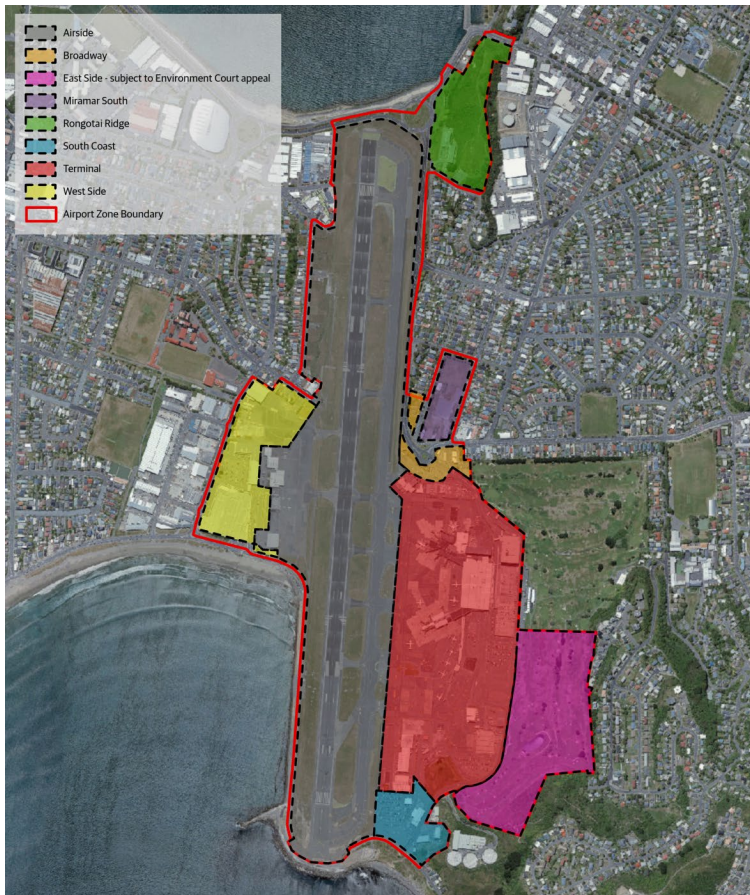
Based on the issues analysis in section 5.3 of this report and the National Planning Standard zone options set out in section 4.4.5 the following zone framework has been selected in relation to this topic:

Zone	Reason/s
Airport Zone	<ul style="list-style-type: none"> <li>• The Airport zone is a Special Purpose Zone</li> <li>• The National Planning Standards specify that the council must choose to use an Airport Zone where an area is: <ul style="list-style-type: none"> <li><i>used predominantly for the operation and development of airports and other aerodromes as well as operational areas and facilities, administrative, commercial and industrial activities associated with airports and other aerodromes.</i></li> </ul> </li> </ul>
Airport Zone precincts	<ul style="list-style-type: none"> <li>• The Airport zone is divided into precincts that are consistent with precincts identified in the Airport's (non-statutory) masterplan.</li> <li>• The National Planning Standards specify that the council may choose to use a precinct approach that: <ul style="list-style-type: none"> <li><i>spatially identifies and manages an area where additional place-based provisions apply to modify or refine aspects of the policy approach or outcomes anticipated in the underlying zone(s).</i></li> </ul> </li> </ul>
Noise Chapter	<ul style="list-style-type: none"> <li>• The National Planning Standards specify that if provisions for managing noise are addressed, they must be located in a district-wide Noise Chapter. For that reason, airport noise is separately addressed in the proposed District Plan Noise Chapter, with Air Noise overlays mapped that extend beyond the Airport Zone, over significant parts of the surrounding city, and with associated rules.</li> </ul>

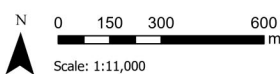
Light, Signs, and Earthwork chapters

- The National Planning Standards specify that if provisions for managing light, signs, earthworks are addressed, they must be located in topic specific district-wide chapters. For that reason, airport related light, sign, earthwork matters are separately addressed in the proposed District Plan Light, Sign and Earthwork Chapters.

### Airport Zone and Precinct Boundaries



#### Airport Precinct Boundaries



Date: 10/05/2022 3:09 pm  
 Created by: City Insights  
 Contact: [planningforgrowth@wcc.govt.nz](mailto:planningforgrowth@wcc.govt.nz)  
 Website: [planningforgrowth.wellington.govt.nz](http://planningforgrowth.wellington.govt.nz)  
 Base map credits: Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors

The overall extent of the Airport Zone covers land owned by Wellington International Airport Limited (WIAL). The precincts are those identified by the airport’s non-statutory 2040 masterplan. All parts of the Airport Zone, with the exception of the Rongotai Ridge precinct, are subject to WIAL designations.

## 8.0 Overview of Proposal/s

The proposed provisions relevant to this topic are set out in detail in the ePlan and should be referenced to in conjunction with this evaluation report.

In summary, the proposed provisions include:

- Definitions
  - A set of relevant definitions, including:
    - Airport Purposes
    - Airport Related Activities
    - Air Noise Overlay (including an Inner Air Noise overlay, Outer Air Noise overlay, and an Air Noise Boundary)
    - Non-Airport Activity
- Six objectives that address:
  - Purpose of the Airport Zone
  - Development within the zone
  - Compatibility of Airport zone activities internally and externally (i.e., outside the zone)
  - Management of adverse effects
  - Carbon neutrality
  - Resilience
- Five policies that:
  - Enable Airport Purposes activities
  - Allow for Airport Related activities
  - Discourage certain Non-Airport activities
  - Maintain and enhance public character
  - Manage activities and buildings have regard to effects
- A rule framework that manages land use and building and structure activities as follows:
  - Landuse activities
    - Airport Purposes – Permitted
    - Golf course in the East Side precinct – Permitted
    - Land development and construction in the East Side precinct – Controlled
    - Airport Related activities in the Terminal precinct – Controlled
    - Airport Related activities in other precincts – Restricted discretionary
    - Commercial / retail activities in Miramar South precinct – Non-Complying
    - Commercial / retail exceeding the current floor area in Tirangi Road Retail Park – Non-Complying
    - Non-Airport activities – Discretionary or Non-Complying
  - Building and structure activities
    - For Airport Purposes – Permitted (subject to height and location)
    - For Airport Related activities – controlled (subject to height and location)
    - Airport Purposes or Airport Related buildings not meeting standards – Restricted Discretionary
    - For Non-Airport activities – Discretionary or Non-complying
    - Any building in the East Side precinct landscape buffer area that is not otherwise a Controlled activity – Discretionary
- A complementary set of effects standards that address:
  - Height and location of buildings in Miramar South and Rongotai Ridge precincts
  - Height and location of buildings elsewhere

- Restrictions on commercial and retail development
- Supporting Design Guides that address:
  - Urban design outcomes in the Miramar South precinct

## **9.0 Evaluation of Proposed Objective/s**

### **9.1 Introduction**

Section 32(1)(a) of the RMA requires that the evaluation report examine the extent to which the objectives of the proposal are the most appropriate way to promote the sustainable management of natural and physical resources.

An examination of the proposed objectives along with reasonable alternatives is included below, with the relative extent of their appropriateness based on an assessment against the following criteria:

1. Relevance (i.e. Is the objective related to addressing resource management issues and will it achieve one or more aspects of the purpose and principles of the RMA?)
2. Usefulness (i.e. Will the objective guide decision-making? Does it meet sound principles for writing objectives (i.e. does it clearly state the anticipated outcome?)
3. Reasonableness (i.e. What is the extent of the regulatory impact imposed on individuals, businesses or the wider community? Is it consistent with identified tangata whenua and community outcomes?)
4. Achievability (i.e. Can the objective be achieved with tools and resources available, or likely to be available, to the Council?)

### **9.2 Evaluation of Objectives**

While not specifically required under s32, it is appropriate to also consider alternative objectives to those currently included in the Proposed District Plan, so as to ensure that the proposed objective(s) are the most appropriate to achieve the purpose of the RMA.

For the purposes of this evaluation, the Council has considered two potential objectives:

1. The proposed objective
2. The current most relevant objective - the status quo

Proposed objectives AIRPZ-01 AND AIRPZ-02:		
AIRPZ-01: Wellington International Airport is recognised and protected as locally and regionally significant infrastructure.		
AIRPZ-02: The dual character of the Airport Zone as a working environment and a regional / international gateway is balanced, recognising:		
<ol style="list-style-type: none"> <li>1. The Airport's role as an air and land transport hub that provides for the safe and efficient movement of people and goods;</li> <li>2. There will be development that reflects the purpose of the Airport Zone, and for airport related purposes that provide the Airport with other forms of support; and</li> <li>3. A higher standard of design may be necessary where large buildings or structures are adjacent to or visible from the public domain.</li> </ol>		
<b>General intent:</b>		
These objectives set the overarching framework for Airport zone. That is, an acknowledgement that the Airport is significant infrastructure but that its operation and development should also take a balanced approach to managing effects. They also establish 'Airport Purposes' as a concept, which is important in that it parallels (but does not rely on) Airport Purposes as referred to WIAL's designations.		
<b>Other potential objectives</b>		
Status quo: 10.2.1 - To promote the safe, effective and efficient operation of the Airport.		
	<b>Preferred objective</b>	<b>Status quo</b>
<b>Relevance:</b>		
Addresses a relevant resource management issue	<ul style="list-style-type: none"> <li>• Relates to: <ul style="list-style-type: none"> <li>○ s.7(b) the efficient use and development of natural and physical resources</li> <li>○ s.7(c) the maintenance and enhancement of amenity values</li> <li>○ s.7(f) maintenance and enhancement of the quality of the environment</li> <li>○ s.7(g) any finite characteristics of natural and physical resources</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Relates to the same RMA section 7 matters, but with less clarity</li> </ul>
Assists the Council to undertake its functions under s31 RMA	<ul style="list-style-type: none"> <li>• Achieves s.31(1)(a) with respect to integrated management</li> </ul>	<ul style="list-style-type: none"> <li>• Neutral or uncertain outcomes under s.31(1)(a) with respect to integrated management</li> </ul>
Gives effect to higher level documents	<ul style="list-style-type: none"> <li>• Achieves consistency with RPS status of Airport as regionally significant infrastructure</li> </ul>	<ul style="list-style-type: none"> <li>• Fails to give effect to RPS status of Airport as regionally significant infrastructure</li> </ul>
<b>Usefulness:</b>		
Guides decision-making	<ul style="list-style-type: none"> <li>• Achieves greater clarity for decision makers</li> </ul>	<ul style="list-style-type: none"> <li>• Guidance is less certain by comparison with preferred objectives</li> </ul>

Meets best practice for objectives	<ul style="list-style-type: none"> <li>• Achieves best practices by more clearly stating outcomes</li> </ul>	<ul style="list-style-type: none"> <li>• Neutral or uncertain by comparison with preferred objectives</li> </ul>
<b>Reasonableness:</b>		
Will not impose unjustifiably high costs on the community/parts of the community	<ul style="list-style-type: none"> <li>• Generally neutral with regard to costs borne by the community, as most of the Airport Zone is 'business as usual'.</li> <li>• Uncertain with regard to the community adjacent to the East Side expansion, but noting that the expansion has been achieved via designation, so the zoning / provisions have little influence on the outcomes</li> </ul>	<ul style="list-style-type: none"> <li>• Neutral – impacts are existing, although would continue to intensify under the operative provisions</li> </ul>
Acceptable level of uncertainty and risk	<ul style="list-style-type: none"> <li>• Achieves greater clarity for decision makers</li> </ul>	<ul style="list-style-type: none"> <li>• Uncertain by comparison with preferred objectives</li> </ul>
<b>Achievability:</b>		
Consistent with identified tangata whenua and community outcomes	<ul style="list-style-type: none"> <li>• Neutral with respect to tangata whenua outcomes (none have been identified)</li> <li>• Achieves / neutral with respect to community outcomes, given the recent settlement of designations covering the Airport</li> </ul>	<ul style="list-style-type: none"> <li>• Neutral with respect to tangata whenua outcomes (none have been identified)</li> <li>• Achieves / neutral with respect to community outcomes, although noting community dissatisfaction with noise outcomes (addressed in s32 evaluation for Noise chapter)</li> </ul>
Realistically able to be achieved within the Council's powers, skills and resources	<ul style="list-style-type: none"> <li>• Achieved through proposed rules and standards.</li> <li>• Note that outcomes will also be achieved through WIAL compliance with the conditions of its designations.</li> </ul>	<ul style="list-style-type: none"> <li>• Achieved through operative rules and standards</li> </ul>
<b>Summary</b>		
The proposed objectives are clearer and more targeted than the status quo, providing greater clarity to decision makers when considering resource consent applications		

Proposed objectives AIRPZ-03 and AIRPZ-04:

AIRPZ-03: Airport Related and Non-Airport activities are:

1. Compatible with the efficient operation, maintenance, and upgrading of the Airport and its associated effects;
2. Compatible with the efficient and integrated functioning of other transport networks; and
3. The operation of the Airport is protected from reverse sensitivity effects outside the Airport Zone.

AIRPZ-04: Adverse effects of activities are avoided, remedied, or mitigated, while recognising:

1. The need for effects management within the Airport Zone, including effects on the amenity of the surrounding area; and
2. The need for effects management in adjacent areas outside the Airport Zone, to avoid or limit effects on the efficiency and safety of the Airport.

**General intent:**

These objectives reinforce and expand on the direction provided by AIRPZ-01 and AIRPZ-02. They also refer to the defined concepts of Airport Related and Non-Airport activities, which are built upon in subsequent policies, rules and standards. These objectives set the overall framework for effects management.

**Other potential objectives**

- Status quo:
- 10.2.1 - To promote the safe, effective and efficient operation of the Airport.
  - 10.2.3 - To provide for non-airport activities and developments within the Airport area of the Precinct.
  - 10.2.4 - Protect the character and amenities of identified areas within the Airport area from inappropriate non-airport related uses and development
  - 10.2.5 - To protect the amenities of areas surrounding, and within, the Precinct from adverse environmental effects.
  - 10.2.6 - To avoid or mitigate the adverse effects of natural and technological hazards on people, property and the environment.

	Preferred objective	Status quo
--	---------------------	------------

**Relevance:**

<p>Addresses a relevant resource management issue</p>	<ul style="list-style-type: none"> <li>• Relates to:                             <ul style="list-style-type: none"> <li>○ s.7(b) the efficient use and development of natural and physical resources</li> <li>○ s.7(c) the maintenance and enhancement of amenity values</li> <li>○ s.7(f) maintenance and enhancement of the quality of the environment</li> <li>○ s.7(g) any finite characteristics of natural and physical resources</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Relates to the same RMA section 7 matters, but with less clarity</li> </ul>
---	--	--

Assists the Council to undertake its functions under s31 RMA	<ul style="list-style-type: none"> <li>• Achieves s.31(1)(a) with respect to integrated management through: <ul style="list-style-type: none"> <li>○ A specific reference to integration with other transport networks</li> <li>○ Acknowledgement that effects between the Airport and adjacent zones need to be managed</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Neutral or uncertain outcomes under s.31(1)(a) with respect to integrated management</li> </ul>
Gives effect to higher level documents	<ul style="list-style-type: none"> <li>• Gives effect to Policies 7(a)(i), 8, and 39(b) of the RPS</li> </ul>	<ul style="list-style-type: none"> <li>• Uncertain by comparison with preferred objectives</li> </ul>
<b>Usefulness:</b>		
Guides decision-making	<ul style="list-style-type: none"> <li>• Achieves greater clarity for decision makers</li> </ul>	<ul style="list-style-type: none"> <li>• Guidance is less certain by comparison with preferred objectives</li> </ul>
Meets best practice for objectives	<ul style="list-style-type: none"> <li>• Achieves best practices by more clearly stating outcomes</li> </ul>	<ul style="list-style-type: none"> <li>• Neutral or uncertain by comparison with preferred objectives</li> </ul>
<b>Reasonableness:</b>		
Will not impose unjustifiably high costs on the community/parts of the community	<ul style="list-style-type: none"> <li>• Generally neutral with regard to costs borne by the community, as most of the Airport Zone is 'business as usual'.</li> </ul>	<ul style="list-style-type: none"> <li>• Neutral – impacts are existing, although would continue to intensify under the operative provisions</li> </ul>
Acceptable level of uncertainty and risk	<ul style="list-style-type: none"> <li>• Achieves greater clarity for decision makers</li> </ul>	<ul style="list-style-type: none"> <li>• Uncertain by comparison with preferred objectives</li> </ul>
<b>Achievability:</b>		
Consistent with identified tangata whenua and community outcomes	<ul style="list-style-type: none"> <li>• Neutral with respect to tangata whenua outcomes (none have been identified)</li> <li>• Achieves / neutral with respect to community outcomes, given the recent settlement of designations covering the Airport</li> </ul>	<ul style="list-style-type: none"> <li>• Neutral with respect to tangata whenua outcomes (none have been identified)</li> <li>• Achieves / neutral with respect to community outcomes, although noting community dissatisfaction with noise outcomes (addressed in s32 evaluation for Noise chapter)</li> </ul>
Realistically able to be achieved within the Council's powers, skills and resources	<ul style="list-style-type: none"> <li>• Achieved through proposed rules and standards.</li> <li>• Note that outcomes will also be achieved through WIAL compliance with the conditions of its designations.</li> </ul>	<ul style="list-style-type: none"> <li>• Achieved through operative rules and standards</li> </ul>
<b>Summary</b>		
The proposed objectives are clearer and more targeted than the status quo, providing greater clarity to decision makers when considering resource consent applications		



Proposed objectives AIRPZ-05 and AIRPZ-06:

AIRPZ-05: Activities are enabled that contribute to carbon neutrality, including:

1. Decarbonisation of the airport and aircraft operations;
2. Significant growth in integrated low-carbon land transport options to and from the airport; and
3. Generation, storage and use of renewable or low carbon energy for the airport.

AIRPZ-06: The resilience of the Airport and its supporting infrastructure, including other transport links, is maintained or enhanced, while providing for the Airport’s operational and functional requirements.

**General intent:**

These objectives differ from AIRPZ-01 to AIRPZ-04 in that they relate to broader environmental issues. Nonetheless, they are still linked to safe and efficient operation of the Airport and its integration with wider networks and the world at large. The Airport’s climate change response, and resilience to other stresses, are of vital importance for this regionally significant infrastructure.

**Other potential objectives**

Status quo: 10.2.1 - To promote the safe, effective and efficient operation of the Airport.  
 10.2.6 - To avoid or mitigate the adverse effects of natural and technological hazards on people, property and the environment.

	Preferred objective	Status quo
<i>Relevance:</i>		
Addresses a relevant resource management issue	<ul style="list-style-type: none"> <li>• Relates to:                             <ul style="list-style-type: none"> <li>○ s.6(h) the management of significant risks from natural hazards</li> <li>○ s.7(ba) the efficiency of the end use of energy</li> <li>○ s.7(i) the effects of climate change</li> <li>○ s.7(j) the benefits to be derived from the use and development of renewable energy</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Relates to s.6(h) the management of significant risks from natural hazards</li> </ul>
Assists the Council to undertake its functions under s31 RMA	<ul style="list-style-type: none"> <li>• Achieves s.31(1)(a) with respect to integrated management through A specific reference to integration with other transport networks</li> <li>• Achieves s.31(1)(b)(i) with respect to the avoidance or mitigation of natural hazards</li> </ul>	<ul style="list-style-type: none"> <li>• Achieves s.31(1)(b)(i) with respect to the avoidance or mitigation of natural hazards</li> </ul>

Gives effect to higher level documents	<ul style="list-style-type: none"> <li>• Gives effect to Objective 19 and 21, and Policy 51 of the RPS</li> </ul>	<ul style="list-style-type: none"> <li>• Gives effect to natural hazards provisions of RPS, but not to climate change</li> </ul>
<b>Usefulness:</b>		
Guides decision-making	<ul style="list-style-type: none"> <li>• Achieves greater clarity for decision makers</li> </ul>	<ul style="list-style-type: none"> <li>• Guidance is less certain by comparison with preferred objectives</li> </ul>
Meets best practice for objectives	<ul style="list-style-type: none"> <li>• Achieves best practices by more clearly stating outcomes</li> </ul>	<ul style="list-style-type: none"> <li>• Neutral or uncertain by comparison with preferred objectives</li> </ul>
<b>Reasonableness:</b>		
Will not impose unjustifiably high costs on the community/parts of the community	<ul style="list-style-type: none"> <li>• Beneficial to the community at large through recognition of climate change, renewable energy, and natural hazard matters.</li> </ul>	<ul style="list-style-type: none"> <li>• Neutral</li> </ul>
Acceptable level of uncertainty and risk	<ul style="list-style-type: none"> <li>• Achieves greater clarity for decision makers</li> </ul>	<ul style="list-style-type: none"> <li>• Uncertain by comparison with preferred objectives</li> </ul>
<b>Achievability:</b>		
Consistent with identified tangata whenua and community outcomes	<ul style="list-style-type: none"> <li>• Neutral with respect to tangata whenua outcomes (none have been identified)</li> <li>• Achieves with respect to community outcomes, through focus on climate change in the recent settlement of designations covering the Airport</li> </ul>	<ul style="list-style-type: none"> <li>• Neutral with respect to tangata whenua outcomes (none have been identified)</li> <li>• Neutral with respect to community outcomes</li> </ul>
Realistically able to be achieved within the Council's powers, skills and resources	<ul style="list-style-type: none"> <li>• Achieved through policy direction and through links back to policy considerations specified by rules.</li> <li>• Note that outcomes will also be achieved through WIAL compliance with the conditions of its designations.</li> </ul>	<ul style="list-style-type: none"> <li>• Achieved through operative rules and standards</li> </ul>
<b>Summary</b>		
The proposed objectives are clearer and more targeted than the status quo, providing greater clarity to decision makers when considering resource consent applications		

## **10.0 Evaluation of Reasonably Practicable Options and Associated Provisions**

### **10.1 Introduction**

Under s32(1)(b) of the RMA, reasonably practicable options to achieve the objective/s associated with this proposal need to be identified and examined. This section of the report evaluates the proposed policies and rules, as they relate to the associated objective(s).

Along with the proposed provisions, the Council has also identified through the research, consultation, information gathering and analysis undertaken in relation to this topic to achieve the objective/s.

The technical and consultation input used to inform this process is outlined in section 5 of this report.

### **10.2 Evaluation method**

For each potential approach an evaluation has been undertaken relating to the costs, benefits and the certainty and sufficiency of information (as informed by section 5 of this report) in order to determine the effectiveness and efficiency of the approach, and whether it is the most appropriate way to achieve the relevant objective(s).

This evaluation is contained in the following sections.

### **10.3 Provisions to achieve Objectives**

For the purpose of this evaluation, the Council has considered the following potential options:

1. The proposed provisions
2. The status quo

No 'reasonable alternative/s' are considered to exist because:

- The nature of the Airport's operation and development is driven by passenger / air traffic demand, which is beyond the Council's control.
- Existing designations, with associated conditions, have been approved through public processes. The designation conditions facilitate specific physical and effects outcomes.
- The Airport is regionally significant infrastructure. Policy 8 of the RPS directs that it be 'protected' from incompatible subdivision, use and development occurring under, over or adjacent to it.

The explanation to Policy 8 in the RPS notes that:

"Incompatible subdivisions, land uses or activities are those which adversely affect the efficient operation of infrastructure, its ability to give full effect to any consent or other authorisation, restrict its ability to be maintained, or restrict the ability to upgrade where the effects of the upgrade are the same or similar in character, intensity, and scale. It may also include new land uses that are sensitive to activities associated with infrastructure.

Protecting regionally significant infrastructure does not mean that all land uses or activities under, over, or adjacent are prevented. The Wellington Regional Council and

city and district councils will need to ensure that activities provided for in a district or regional plan are compatible with the efficient operation, maintenance, and upgrading (where effects are the same or similar in character, intensity, and scale) of the infrastructure and any effects that may be associated with that infrastructure. Competing considerations need to be weighed on a case by case basis to determine what is appropriate in the circumstances.”

While this direction from the RPS does not prevent the consideration of alternatives, it does severely limit the usefulness of an alternative assessment – especially in the context of Airport operations that are managed by designations (an “other authorisation” in the language of the explanation). It is therefore considered unlikely that a ‘reasonable’ alternative could be identified.

For those reasons, the following evaluation has been confined to the proposed provisions and the status quo.

**Objective AIRPZ-O1:**

AIRPZ-O1: Wellington International Airport is recognised and protected as locally and regionally significant infrastructure.

**Proposed provisions**

This is an overarching objective for Airport zone. It is an acknowledgement that the Airport is significant infrastructure.

Although not considered here (see next table for assessment), it should be read in conjunction with AIRPZ-O2. That objective acknowledges the although the Airport is regionally significant, its ongoing should take a balanced approach to managing effects.

The headline title of AIRPZ-O1 is “Purpose of the Airport”. This helps to establish ‘Airport Purposes’ as a concept, which is important in that it parallels (but does not rely on) Airport Purposes as referred to in WIAL’s designations.

Note that all of the land covered by the Airport Zone / Chapter is owned by WIAL, but other privately owned businesses also operate within the land – subject to WIAL’s approval.

**Costs**

The environmental and social costs of the Airport’s existence and ongoing development fall largely on the community. This is especially the case for immediate neighbours, but also for the eastern suburbs in general. The most obvious effect is noise (addressed in the PDP Noise chapter), but also with respect to land transport traffic generated by the Airport.

Affected Group	Costs
Existing local community	Adverse effects on: <ul style="list-style-type: none"> <li>• Health (noise)</li> <li>• Traffic congestion</li> <li>• Visual amenity</li> <li>• Development rights (OLS restrictions)</li> <li>• Property values</li> </ul>
Future generations	Risks: <ul style="list-style-type: none"> <li>• Arising from climate change through aircraft carbon emissions</li> </ul>
Iwi/Māori	<ul style="list-style-type: none"> <li>• No identified impacts</li> </ul>
Landowner (WIAL)	<ul style="list-style-type: none"> <li>• No more than minor</li> </ul>
Businesses	<ul style="list-style-type: none"> <li>• No more than minor</li> </ul>
Consent authority	Cost of administering the new provisions: <ul style="list-style-type: none"> <li>• Providing information</li> <li>• Recruiting and training staff</li> <li>• Processing consent applications / outline plans</li> </ul> Cost of verifying compliance: <ul style="list-style-type: none"> <li>• Conducting inspections and audits</li> <li>• Monitoring</li> </ul> Cost of enforcement: <ul style="list-style-type: none"> <li>• Investigating non-compliance</li> </ul>

*NB: costs to the Council should be relatively minor, as Airport Purposes activities will typically be enabled by WIAL’s designations and therefore not require resource consent*

**Benefits**

Pre-Covid, an economic impact assessment (EIA) undertaken by Business and Economic Research Limited (BERL) as part of the 2040 Master planning found that in 2018 the activity enabled by the airport contributed \$1.1B in GDP to the region per annum, directly and indirectly supporting 11,000 Full Time Equivalents (FTEs). In addition to the 107 FTEs employed by the airport itself, there were 77 individual businesses operating at the airport campus from airlines to ground handlers, restaurants to rental cars and many highly skilled technical support services, directly supporting 1,342 FTEs (with a further 1,422 FTEs supported indirectly).

Looking forward, an economic impact study undertaken by BERL predicts that by 2040, the airport will make a direct contribution to the region of \$4.3 billion per year, generating \$2.1 billion of GDP and facilitating more than 22,500 jobs.

Affected Group	Benefits
Existing city, regional, and national community	<ul style="list-style-type: none"> <li>• Access to more travel / freight movement opportunities</li> <li>• Employment opportunities</li> <li>• ‘Lifeline’ / resilience benefits in the event of natural disaster</li> <li>• Management of environmental impacts</li> </ul>
Future generations	<ul style="list-style-type: none"> <li>• As above for community</li> </ul>
Iwi/Māori	<ul style="list-style-type: none"> <li>• No identified impacts</li> </ul>
Landowner (WIAL)	<ul style="list-style-type: none"> <li>• Certainty of consent thresholds and processes</li> </ul>
Businesses	<ul style="list-style-type: none"> <li>• Access to more travel / freight movement opportunities</li> <li>• Employment opportunities</li> <li>• Opportunities for development with the zone</li> <li>• Certainty of consent thresholds and processes</li> </ul>

**Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions**

The information provided during the processes to establish WIAL’s designations is considered sufficient for the purposes of this assessment.

		<ul style="list-style-type: none"> <li>• Conducting prosecutions</li> </ul>	Consent authority	<ul style="list-style-type: none"> <li>• Reduced resource, administrative, compliance, and enforcement burden.</li> </ul>	
<b>Option 1: Proposed approach (recommended)</b>	<b>Costs</b>	<b>Benefits</b>	<b>Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions</b>		
<p><b>Policies:</b></p> <p><u>AIRPZ-P1</u> Enable Airport Purposes activities, buildings and structures, including but not limited to those that:</p> <ol style="list-style-type: none"> <li>1. Facilitate the transport of people and cargo by aircraft.</li> <li>2. Are ancillary activities or services that provide essential support to the transport function.</li> </ol> <p><b>Rules:</b></p> <p><u>AIRPZ-R1</u> Airport purposes activities</p> <p><u>AIRPZ-R2</u> Airport related activities</p> <p><u>AIRPZ-R4</u> Buildings and structures</p> <p><b>Other Methods:</b></p> <p>Airport designations: Council responses to outline plans</p>	<p>Costs as generally set out above under Proposed Provisions.</p> <p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>• Climate change</li> <li>• Noise</li> <li>• Visual</li> </ul> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>• Traffic congestion</li> </ul> <p>Unless land transport to the Airport is adequately addressed, there may ultimately be economic disbenefits due to increased transport times. This risk / cost has not been quantified.</p> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>• Limits on housing in noise affected areas (see Noise chapter)</li> <li>• Effects on enjoyment of external amenity in noise affected areas</li> </ul> <p><b>Cultural</b></p> <ul style="list-style-type: none"> <li>• Nil</li> </ul>	<p>Benefits as generally set out above under Proposed Provisions.</p> <p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>• Management of effects achieved through rules and standards</li> </ul> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>• Economic and employment growth for Wellington associated with growth in air traffic and development of the Airport: <ul style="list-style-type: none"> <li>○ Annual GDP contribution <ul style="list-style-type: none"> <li>▪ 2018 – \$1.1 billion</li> <li>▪ 2040 – \$2.1 billion</li> </ul> </li> <li>○ FTE employment <ul style="list-style-type: none"> <li>▪ 2018 – 11,000</li> <li>▪ 2040 – 22,500</li> </ul> </li> </ul> </li> </ul> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>• Ability to travel</li> <li>• 'Lifeline' / resilience support</li> <li>• Employment (see above)</li> </ul> <p><b>Cultural</b></p> <ul style="list-style-type: none"> <li>• Nil</li> </ul>	<p>It is considered that there is certain and sufficient information on which to base the proposed policies and methods as:</p> <ul style="list-style-type: none"> <li>• Information was provided during the processes to establish WIAL's designations.</li> </ul>		
<b>Effectiveness and efficiency</b>	<b>Effectiveness</b>		<b>Efficiency</b>		
	<p>AIRPZ-P1 and AIRPZ-R1 are focused on enabling Airport Purposes, which is a term defined by the proposed district plan. The district plan definition reflects Airport purposes as described by WIAL's designations. The intention is that it generally applies to the activities that are also enabled by WIAL's designations.</p> <p>If any third party activities are judged to be for Airport Purposes, they would be subject to the need for resource consent under AIRPZ-R1.</p>		<p>The policy and rule would only apply in situations where the limits of designation conditions are exceeded, or if a designation was ever uplifted. For the most part, this will deliver low cost outcomes to WIAL, the Council and the community, as most activities of WIAL are expected to be facilitated by the designation conditions. The Council will face minor costs in circumstances where an Outline Plan (s76A RMA) is submitted for consideration / comment.</p>		
<b>Overall evaluation</b>	This option is the most appropriate, as it is intended to dovetail with the existence of WIAL's designations and support the primary use of the Airport for Airport Purposes.				
<b>Option 2: Status Quo</b>	<b>Costs</b>	<b>Benefits</b>	<b>Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions</b>		

<p><b>Policies:</b></p> <p><u>Policy 10.2.1.1</u> Provide for activities which will ensure the safe, effective and efficient use of the Airport area as a strategic transport node for the city, region and nation.</p> <p><u>Policy 10.2.3.1</u> Ensure non-airport activities and developments do not compromise the ongoing and strategic transport role of the Airport to the city, region and nation.</p> <p><b>Rules:</b></p> <p><u>Rule 11.1.1</u> Activities related to the primary function of the Airport, subject to conditions for:</p> <ul style="list-style-type: none"> <li>• Noise</li> <li>• Screening of activities and storage</li> <li>• Dust</li> <li>• Vehicle parking</li> <li>• Site access for vehicles</li> <li>• Lighting</li> <li>• Use, storage or handling of hazardous substances</li> <li>• Landscape design</li> <li>• Discharge of contaminants</li> <li>• Electromagnetic radiation</li> </ul> <p><b>Other Methods:</b></p> <p>Nil</p>	<p>The current regime imposes greater costs on the Airport operator (WIAL) through the need to undertake resource consent processes for land use activities. Now that designations and supporting conditions are in place, the outline plan process generally takes significantly less time than similar resource consent processes and the process incurs lower costs. The policies and rules of the proposed plan are intended to dovetail with the designations, as opposed to the operative district plan which does not.</p> <p>Other than the time / monetary costs to WIAL and the Council (and sometimes the community) of the resource consent process, the costs of the status quo are largely the same as for the preferred option.</p> <p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>• Climate change</li> <li>• Noise</li> <li>• Visual</li> </ul> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>• Ongoing time and monetary costs to WIAL in seeking resource consents for various activities / structures</li> <li>• Traffic congestion</li> </ul> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>• Limits on housing in noise affected areas (see Noise chapter)</li> <li>• Effects on enjoyment of external amenity in noise affected areas</li> </ul> <p><b>Cultural</b></p> <ul style="list-style-type: none"> <li>• Nil</li> </ul>	<p>The primary benefit of the status quo, in relation to the primary purpose of the Airport, could be assumed as providing greater potential for the community to input to resource consent processes. In the same vein, Council administration / oversight via resource consents can be seen as a benefit.</p> <p>However, these are moot points as WIAL's activities are now provided under designations – although the same need for resource consent exists if the designation conditions are not met, and consents are still required by third parties.</p> <p>The benefits of the status quo are not as clear as the preferred option, as there is less direction regarding renewable energy and actions related to climate change.</p> <p>Economic and employment benefits would be less, as the status quo does not include the Airport's East Side expansion, or the Miramar South services area, which have been enabled via designations.</p> <p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>• Management of effects achieved through rules and conditions of rules</li> </ul> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>• Less than the preferred option as status quo does not include expansion</li> </ul> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>• Ability to travel</li> <li>• 'Lifeline' / resilience support</li> <li>• Employment</li> </ul> <p><b>Cultural</b></p> <ul style="list-style-type: none"> <li>• Nil</li> </ul>	<p>It is considered that there is certain and sufficient information to understand the implications of continuing with the operative provisions as they have been in place since July 2000.</p>
<p><b>Effectiveness and efficiency</b></p>	<p><b>Effectiveness</b></p> <p>None of the operative policies refer to the 'primary function of the Airport', which is a term defined by the operative plan – and equivalent in intent to 'Airport Purposes' under the PDP. Operative rules do refer to the Airport's primary function, but the lack of policy support means this is somewhat less effective.</p>		<p><b>Efficiency</b></p> <p>The status quo policy and rules would only apply in situations where the limits of designation conditions are exceeded, or if a designation was ever uplifted. The Council will face minor costs in circumstances where an Outline Plan (s76A RMA) is submitted for consideration / comment.</p>
<p><b>Overall evaluation</b></p>	<p><b>Effectiveness</b></p> <p>Major sections of the operative district plan rules (under Rule 11.1.1) relate to matters that are now addressed by other chapters of the proposed district plan. Noise is a significant example, with the matters covered by Rules 11.1.1.1.1 to 11.1.1.1.9 now covered by the rules and standards of the PDP Noise chapter. The status quo, with respect to Airport focused</p>		

policies and rules, is now very much out of step with the National Planning Standard approach and other matters such as hazardous substances management. In those respects, the status quo is not an effective approach.

**Objectives AIRPZ-O2, AIRPZ-O3 and AIRPZ-O4:**

**AIRPZ-O2:** The dual character of the Airport Zone as a working environment and a regional / international gateway is balanced, recognising:

1. The Airport’s role as an air and land transport hub that provides for the safe and efficient movement of people and goods;
2. There will be development that reflects the purpose of the Airport Zone, and for airport related purposes that provide the Airport with other forms of support; and
3. A higher standard of design may be necessary where large buildings or structures are adjacent to or visible from the public domain.

**AIRPZ-O3:** Airport Related and Non-Airport activities are:

1. Compatible with the efficient operation, maintenance, and upgrading of the Airport and its associated effects;
2. Compatible with the efficient and integrated functioning of other transport networks; and
3. The operation of the Airport is protected from reverse sensitivity effects outside the Airport Zone.

**AIRPZ-O4:** Adverse effects of activities are avoided, remedied, or mitigated, while recognising:

1. The need for effects management within the Airport Zone, including effects on the amenity of the surrounding area; and
2. The need for effects management in adjacent areas outside the Airport Zone, to avoid or limit effects on the efficiency and safety of the Airport.

Proposed provisions	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions														
<p>These objectives set the overall framework for <i>effects management</i>.</p> <p>They reinforce and expand on the direction provided by AIRPZ-O1. AIRPZ-O2 in particular links to AIRPZ-O1. They also refer to the defined concepts of Airport Related and Non-Airport activities, which are built upon in subsequent policies, rules and standards.</p> <p>An 'Airport Related Activity' is specific to third party ancillary activities or services that provide support to the airport. They include:</p> <ol style="list-style-type: none"> <li>a. land transport activities;</li> <li>b. buildings and structures;</li> <li>c. servicing and infrastructure;</li> <li>d. police stations, fire stations, and medical facilities;</li> <li>e. education facilities provided they serve an aviation related purpose;</li> </ol>	<p>The Airport is a destination for substantial traffic volumes. Pre-Covid there were 16,000 to 17,000 daily car trips to and from the Airport via Cobham Drive.</p> <p>Adverse effects of street-side parking by Airport users in nearby neighbourhoods may be an ongoing issue.</p> <p>Noise (addressed in Noise chapter) will be an ongoing issue. There will be costs for appropriate noise insulation and limits to the number of dwellings that can be constructed near the Airport (without the need for consent). Affected numbers are covered in the Noise s32 evaluation. Note that WIAL proposes to continue rolling out its Quieter Homes programme which will cover some insulation costs.</p> <table border="1" data-bbox="549 1333 1231 1879"> <thead> <tr> <th>Affected Group</th> <th>Costs</th> </tr> </thead> <tbody> <tr> <td>Existing local community</td> <td>Adverse effects on: <ul style="list-style-type: none"> <li>• Visual amenity</li> <li>• Health (noise)</li> <li>• Traffic congestion</li> <li>• Development rights (OLS restrictions)</li> <li>• Property values</li> </ul> </td> </tr> <tr> <td>Future generations</td> <td>Risks: <ul style="list-style-type: none"> <li>• Visual amenity</li> <li>• Health (noise)</li> <li>• Traffic congestion</li> </ul> </td> </tr> <tr> <td>Iwi/Māori</td> <td>• No identified impacts</td> </tr> </tbody> </table>	Affected Group	Costs	Existing local community	Adverse effects on: <ul style="list-style-type: none"> <li>• Visual amenity</li> <li>• Health (noise)</li> <li>• Traffic congestion</li> <li>• Development rights (OLS restrictions)</li> <li>• Property values</li> </ul>	Future generations	Risks: <ul style="list-style-type: none"> <li>• Visual amenity</li> <li>• Health (noise)</li> <li>• Traffic congestion</li> </ul>	Iwi/Māori	• No identified impacts	<p>Pre-Covid, an economic impact assessment (EIA) undertaken by Business and Economic Research Limited (BERL) as part of the 2040 Master planning found that in 2018 the activity enabled by the airport contributed \$1.1B in GDP to the region per annum, directly and indirectly supporting 11,000 Full Time Equivalents (FTEs). In addition to the 107 FTEs employed by the airport itself, there were 77 individual businesses operating at the airport campus from airlines to ground handlers, restaurants to rental cars and many highly skilled technical support services, directly supporting 1,342 FTEs (with a further 1,422 FTEs supported indirectly).</p> <p>Looking forward, an economic impact study undertaken by BERL predicts that by 2040, the airport will make a direct contribution to the region of \$4.3 billion per year, generating \$2.1 billion of GDP and facilitating more than 22,500 jobs.</p> <table border="1" data-bbox="1231 1459 1958 1890"> <thead> <tr> <th>Affected Group</th> <th>Benefits</th> </tr> </thead> <tbody> <tr> <td>Existing city, regional, and national community</td> <td> <ul style="list-style-type: none"> <li>• Access to more travel / freight movement opportunities</li> <li>• Employment opportunities</li> <li>• 'Lifeline' / resilience benefits in the event of natural disaster</li> <li>• Management of environmental impacts</li> </ul> </td> </tr> <tr> <td>Future generations</td> <td>• As above for community</td> </tr> </tbody> </table>	Affected Group	Benefits	Existing city, regional, and national community	<ul style="list-style-type: none"> <li>• Access to more travel / freight movement opportunities</li> <li>• Employment opportunities</li> <li>• 'Lifeline' / resilience benefits in the event of natural disaster</li> <li>• Management of environmental impacts</li> </ul>	Future generations	• As above for community	<p>The information provided during the processes to establish WIAL's designations is considered sufficient for the purposes of this assessment.</p>
Affected Group	Costs																
Existing local community	Adverse effects on: <ul style="list-style-type: none"> <li>• Visual amenity</li> <li>• Health (noise)</li> <li>• Traffic congestion</li> <li>• Development rights (OLS restrictions)</li> <li>• Property values</li> </ul>																
Future generations	Risks: <ul style="list-style-type: none"> <li>• Visual amenity</li> <li>• Health (noise)</li> <li>• Traffic congestion</li> </ul>																
Iwi/Māori	• No identified impacts																
Affected Group	Benefits																
Existing city, regional, and national community	<ul style="list-style-type: none"> <li>• Access to more travel / freight movement opportunities</li> <li>• Employment opportunities</li> <li>• 'Lifeline' / resilience benefits in the event of natural disaster</li> <li>• Management of environmental impacts</li> </ul>																
Future generations	• As above for community																



<p>f. retail and commercial services and industry associated with the needs of Airport passengers, visitors and employees and/or aircraft movements and Airport businesses;</p> <p>g. administrative offices, provided they are ancillary to an airport or airport related activity.</p> <p>A 'Non-Airport Activity' is one which is not for "Airport Purposes" or an "Airport Related Activity".</p>	Landowner (WIAL)	<ul style="list-style-type: none"> <li>No more than minor</li> </ul>	Iwi/Māori	<ul style="list-style-type: none"> <li>No identified impacts</li> </ul>	
	Businesses	<ul style="list-style-type: none"> <li>Compliance with height and location standards</li> </ul>	Landowner (WIAL)	<ul style="list-style-type: none"> <li>Certainty of consent thresholds and processes</li> </ul>	
	Consent authority	<p>Cost of administering the new provisions:</p> <ul style="list-style-type: none"> <li>Providing information</li> <li>Recruiting and training staff</li> <li>Processing consent applications / outline plans</li> </ul> <p>Cost of verifying compliance:</p> <ul style="list-style-type: none"> <li>Conducting inspections and audits</li> <li>Monitoring</li> </ul> <p>Cost of enforcement:</p> <ul style="list-style-type: none"> <li>Investigating non-compliance</li> <li>Conducting prosecutions</li> </ul>	Businesses	<ul style="list-style-type: none"> <li>Access to more travel / freight movement opportunities</li> <li>Employment opportunities</li> <li>Opportunities for development with the zone</li> <li>Certainty of consent thresholds and processes</li> </ul>	
			Consent authority	<ul style="list-style-type: none"> <li>Reduced resource, administrative, compliance, and enforcement burden.</li> </ul>	
<b>Option 1: Proposed approach (recommended)</b>	<b>Costs</b>	<b>Benefits</b>	<b>Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions</b>		
<p><b>Policies:</b></p> <p><u>AIRPZ-P2</u></p> <p>Allow for Airport Related Activities that provide support to Airport Purposes, including but not limited to those that:</p> <ol style="list-style-type: none"> <li>Provide services to passengers, crew, ground staff, airport workers, and other associated workers and visitors.</li> <li>Support the economic viability of the Airport.</li> <li>Support carbon neutral outcomes, including through transport decarbonisation, and renewable or low carbon</li> </ol>	<p>Costs as generally set out above under Proposed Provisions.</p> <p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>Climate change</li> <li>Noise</li> <li>Visual</li> </ul> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>Traffic congestion</li> </ul> <p>Unless land transport to the Airport is adequately addressed, there may ultimately be economic disbenefits due to increased transport times. This risk / cost has not been quantified.</p> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>Limits on housing in noise affected areas (see Noise chapter)</li> </ul>	<p>Benefits as generally set out above under Proposed Provisions.</p> <p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>Management of effects achieved through policies, rules and standards, including in relation to: <ul style="list-style-type: none"> <li>Urban design</li> <li>Visual impacts, especially at the zone edges</li> <li>Carbon generation</li> <li>Noise (see Noise chapter)</li> </ul> </li> </ul> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>Economic and employment growth for Wellington associated with growth in air traffic and development of the Airport: <ul style="list-style-type: none"> <li>Annual GDP contribution <ul style="list-style-type: none"> <li>2018 – \$1.1 billion</li> <li>2040 – \$2.1 billion</li> </ul> </li> <li>FTE employment</li> </ul> </li> </ul>	<p>It is considered that there is certain and sufficient information on which to base the proposed policies and methods as:</p> <ul style="list-style-type: none"> <li>Information was provided during the processes to establish WIAL's designations.</li> </ul>		

<p>energy generation, storage and use.</p> <p><u>AIRPZ-P3</u> Discourage new non-airport related activities that:</p> <ol style="list-style-type: none"> <li>1. Compromise the long-term availability of land for Airport or Airport Related Activities.</li> <li>2. Give rise to adverse effects on the safety and efficiency of the transportation network.</li> <li>3. Significantly compromise the achievement of carbon neutral outcomes in the Airport as a whole.</li> <li>4. Are incompatible with the overall urban form of adjacent zones.</li> </ol> <p>Where non-Airport activities are allowed, limit their nature, scale and extent to be generally compatible with the outcomes sought under AIRPZ-P1 and AIRPZ-P2.</p> <p><u>AIRPZ-P4</u> Maintain and enhance public character at the zone interface and in publicly accessible parts of zone, including through consideration of:</p> <ol style="list-style-type: none"> <li>1. The interface of the Airport Zone with adjoining and adjacent land.</li> <li>2. The New Zealand Urban Design Protocol.</li> <li>3. Any Landscape Plan, Urban Design Principles or Statement, or Integrated Design Management Plan, prepared for an Airport precinct.</li> </ol>	<ul style="list-style-type: none"> <li>• Effects on enjoyment of external amenity in noise affected areas</li> </ul> <p><b>Cultural</b></p> <ul style="list-style-type: none"> <li>• Nil</li> </ul>	<ul style="list-style-type: none"> <li>▪ 2018 – 11,000</li> <li>▪ 2040 – 22,500</li> </ul> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>• Ability to travel</li> <li>• 'Lifeline' / resilience support</li> </ul> <p><b>Cultural</b></p> <ul style="list-style-type: none"> <li>• Nil</li> </ul>	
---	---	---	--

<p>4. The 'gateway' status of the Broadway, Miramar South and South Coast precincts, with respect to the Airport and adjacent land.</p> <p>5. The visual and landscape significance of the Rongotai Ridge precinct.</p> <p>6. The visual and landscape significance of the Landscape Buffer Area at the eastern margin of the East Side Precinct</p> <p><u>AIRPZ-P5</u> Manage activity, building and structure effects in the Airport Zone, having regard to:</p> <p>1. Design, scale and location, and associated public and private effects, including the impacts of construction.</p> <p>2. Compatibility with the role and function of the Airport Zone.</p> <p>3. Whether the activity, building or structure is ancillary to and/or supports Airport activities.</p> <p>4. Safety, security and resilience of the Airport (and supporting infrastructure) as an air and land transport hub.</p> <p>5. Efficiency and capacity of the Airport and other infrastructure and services.</p> <p>6. Potential conflict with established or permitted activities on adjoining and adjacent land outside the Airport Zone.</p> <p>7. The need to measure, report and pursue decarbonisation of Airport</p>			
--	--	--	--

<p>related activities, including embedded emissions from construction, and activity attracted by the Airport (such as public and private transport).</p> <p><b>Rules:</b></p> <p><u>AIRPZ-R1</u> Airport purposes activities</p> <p><u>AIRPZ-R2</u> Airport related activities</p> <p><u>AIRPZ-R3</u> Non-Airport activities</p> <p><u>AIRPZ-R4</u> Buildings and structures</p> <p><b>Other Methods:</b></p> <p>Airport designations: Council responses to outline plans</p>			
<p><b>Effectiveness and efficiency</b></p>	<p><b>Effectiveness</b></p> <p>AIRPZ-P1 and AIRPZ-R1 are focused on enabling Airport Purposes, which is a term defined by the proposed district plan. The district plan definition reflects Airport purposes as described by WIAL’s designations. The intention is that it generally applies to the activities that are also enabled by WIAL’s designations.</p> <p>If any third party activities are judged to be for Airport Purposes, they would be subject to the need for resource consent under AIRPZ-R1.</p>		<p><b>Efficiency</b></p> <p>The policy and rule would only apply in situations where the limits of designation conditions are exceeded, or if a designation was ever uplifted. For the most part, this will deliver low cost outcomes to WIAL, the Council and the community, as most activities of WIAL are expected to be facilitated by the designation conditions. The Council will face minor costs in circumstances where an Outline Plan (s76A RMA) is submitted for consideration / comment.</p>
<p><b>Overall evaluation</b></p>	<p>This option is the most appropriate, as it is intended to dovetail with the existence of WIAL’s designations, support the primary use of the Airport for Airport Purposes, and achieve desirable outcomes in relation to effects management.</p>		
<p><b>Option 2: Status Quo</b></p>	<p><b>Costs</b></p>	<p><b>Benefits</b></p>	<p><b>Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions</b></p>
<p><b>Policies:</b></p> <p><u>Policy 10.2.3.2</u> Ensure non-airport activities and developments integrate with, and respond appropriately to the surrounding environment.</p> <p><u>Policy 10.2.3.4</u> Manage any potential adverse environmental effects of non-airport</p>	<p>The operative district plan includes an extensive suite of policies that address effects management. Similar matters are addressed by the preferred option, but generally via a combination of rules and standards.</p> <p>Other than the time / monetary costs to WIAL and the Council (and sometimes the community) of the resource consent process, the costs of the status quo are largely the same as for the preferred option.</p> <p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>Climate change</li> </ul>	<p>The benefits of the status quo, with respect to effects management, are similar to the preferred option.</p> <p>Note that the intent of some of the operative policies / rules related to effects management are addressed by the PDP in other chapters – reflecting the framework required by the National Planning Standards. These include in relation to Signs, Lighting, Noise, Earthworks.</p> <p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>Visual</li> </ul>	<p>It is considered that there is certain and sufficient information to understand the implications of continuing with the operative provisions as they have been in place since July 2000.</p>

<p>activities and developments on the environment.</p> <p><u>Policy 10.2.4.1</u> Allow for a wide range of buildings and activities in the Terminal Area to ensure the effective and efficient functioning of the airport.</p> <p><u>Policy 10.2.4.2</u> To maintain the visual and geomorphological importance of Rongotai Ridge.</p> <p><u>Policy 10.2.4.3</u> To allow some development which results in modification of Rongotai Ridge provided it:</p> <ul style="list-style-type: none"> <li>• demonstrates architectural and urban design excellence; and</li> <li>• makes a significant contribution to the image and character of the locality and to Wellington City.</li> </ul> <p><u>Policy 10.2.4.4</u> Strengthen the identity of the Broadway area as an important gateway to the airport and to the residential suburbs of Strathmore and Seatoun.</p> <p><u>Policy 10.2.4.5</u> Allow non-airport activities in the South Coast Area in a manner which will protect and enhance the character of the south coast.</p> <p><u>Policy 10.2.4.6</u> Encourage high quality retail and other non-airport related activities in the West Side which will improve the shopping and business environment for the public and workers.</p> <p><u>Policy 10.2.5.1</u></p>	<ul style="list-style-type: none"> <li>• Noise</li> <li>• Visual</li> </ul> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>• Ongoing time and monetary costs to WIAL in seeking resource consents for various activities / structures</li> <li>• Traffic congestion</li> </ul> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>• Limits on housing in noise affected areas (see Noise chapter)</li> <li>• Effects on enjoyment of external amenity in noise affected areas</li> </ul> <p><b>Cultural</b></p> <ul style="list-style-type: none"> <li>• Nil</li> </ul>	<p><b>Economic</b></p> <ul style="list-style-type: none"> <li>• Less than the preferred option</li> </ul> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>• Ability to travel</li> <li>• 'Lifeline' / resilience support</li> </ul> <p><b>Cultural</b></p> <ul style="list-style-type: none"> <li>• Nil</li> </ul>	
---	---	--	--

<p>Exercise an appropriate level of control over Airport and ancillary activities for the avoidance or mitigation of adverse effects.</p> <p><u>Policy 10.2.5.2</u> Ensure a reasonable protection of residential and school uses from Airport activities by providing controls on bulk and location, ensuring sufficient space is available for landscape design and screening, and by retaining a buffer of land of a recreational nature to the east of the Airport.</p> <p><u>Policy 10.2.5.3</u> Control the interrelationship between building forms and the space around buildings to ensure a high level of visual amenity.</p> <p><b>Rules:</b></p> <p><u>Rule 11.1.2</u> Buildings and structures subject to conditions for:</p> <ul style="list-style-type: none"> <li>• Maximum height</li> <li>• Height control for adjoining areas</li> </ul> <p><u>Rule 11.2.3</u> Non-Airport buildings and activities in the Terminal Area</p> <p><b>Other Methods:</b></p> <p>Nil</p>			
<p><b>Effectiveness and efficiency</b></p>	<p><b>Effectiveness</b></p> <p>None of the operative policies refer to the 'primary function of the Airport', which is a term defined by the operative plan – and equivalent in intent to 'Airport Purposes' under the PDP. Operative rules do refer to the Airport's primary function, but the lack of policy support means this is somewhat less effective.</p>		<p><b>Efficiency</b></p> <p>The status quo policy and rules would only apply in situations where the limits of designation conditions are exceeded, or if a designation was ever uplifted. The Council will face minor costs in circumstances where an Outline Plan (s76A RMA) is submitted for consideration / comment.</p>
<p><b>Overall evaluation</b></p>	<p><b>Effectiveness</b></p> <p>Major sections of the operative district plan rules (under Rule 11.1.1) relate to matters that are now addressed by other chapters of the proposed district plan. Noise is a significant example, with the matters covered by Rules 11.1.1.1 to 11.1.1.9 now covered by the rules and standards of the PDP Noise chapter. The status quo, with respect to Airport focused policies and rules, is now very much out of step with the National Planning Standard approach and other matters such as hazardous substances management. In those respects, the status quo is not an effective approach.</p>		

**Objectives AIRPZ-O5 and AIRPZ-O6:**

- AIRPZ-O5:** Activities are enabled that contribute to carbon neutrality, including:
1. Decarbonisation of the airport and aircraft operations;
  2. Significant growth in integrated low-carbon land transport options to and from the airport; and
  3. Generation, storage and use of renewable or low carbon energy for the airport.

**AIRPZ-O6:** The resilience of the Airport and its supporting infrastructure, including other transport links, is maintained or enhanced, while providing for the Airport’s operational and functional requirements.

Proposed provisions	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions																												
<p>These provisions are specific to <i>carbon neutrality and resilience</i>. Carbon neutrality can be considered to cover “decarbonisation”, which is specifically referred to in some WIAL designations.</p>	<p>Decarbonisation will come at a cost to organisations and individuals. Those costs have not been estimated as part of this assessment.</p> <table border="1" data-bbox="549 661 1231 1911"> <thead> <tr> <th>Affected Group</th> <th>Costs</th> </tr> </thead> <tbody> <tr> <td>Existing local community</td> <td>Adverse effects on:                             <ul style="list-style-type: none"> <li>• Visual amenity from renewable energy infrastructure</li> </ul> </td> </tr> <tr> <td>Future generations</td> <td>Risks:                             <ul style="list-style-type: none"> <li>• Reliability / availability of non-carbon based outcomes</li> </ul> </td> </tr> <tr> <td>Iwi/Māori</td> <td> <ul style="list-style-type: none"> <li>• No identified impacts</li> </ul> </td> </tr> <tr> <td>Landowner (WIAL)</td> <td> <ul style="list-style-type: none"> <li>• WIAL’s designation conditions require it to report on “decarbonisation”</li> <li>• WIAL will need to pursue carbon neutrality in its own operations</li> </ul> </td> </tr> <tr> <td>Businesses</td> <td> <ul style="list-style-type: none"> <li>• Airlines and other Airport based business will need to consider carbon neutrality</li> </ul> </td> </tr> <tr> <td>Consent authority</td> <td>                     Cost of administering the new provisions:                     <ul style="list-style-type: none"> <li>• providing information</li> <li>• recruiting and training staff</li> <li>• processing consent applications / outline plans</li> </ul>                     Cost of verifying compliance:                 </td> </tr> </tbody> </table>	Affected Group	Costs	Existing local community	Adverse effects on: <ul style="list-style-type: none"> <li>• Visual amenity from renewable energy infrastructure</li> </ul>	Future generations	Risks: <ul style="list-style-type: none"> <li>• Reliability / availability of non-carbon based outcomes</li> </ul>	Iwi/Māori	<ul style="list-style-type: none"> <li>• No identified impacts</li> </ul>	Landowner (WIAL)	<ul style="list-style-type: none"> <li>• WIAL’s designation conditions require it to report on “decarbonisation”</li> <li>• WIAL will need to pursue carbon neutrality in its own operations</li> </ul>	Businesses	<ul style="list-style-type: none"> <li>• Airlines and other Airport based business will need to consider carbon neutrality</li> </ul>	Consent authority	Cost of administering the new provisions: <ul style="list-style-type: none"> <li>• providing information</li> <li>• recruiting and training staff</li> <li>• processing consent applications / outline plans</li> </ul> Cost of verifying compliance:	<p>Decarbonisation and resilience each bring significant benefits to the Airport, individuals, and the City. Those benefits have not been estimated as part of this assessment.</p> <table border="1" data-bbox="1231 693 1958 1459"> <thead> <tr> <th>Affected Group</th> <th>Benefits</th> </tr> </thead> <tbody> <tr> <td>Existing city, regional, and national community</td> <td> <ul style="list-style-type: none"> <li>• Security for travel / freight movement</li> <li>• Climate change actions taken</li> </ul> </td> </tr> <tr> <td>Future generations</td> <td> <ul style="list-style-type: none"> <li>• As above</li> </ul> </td> </tr> <tr> <td>Iwi/Māori</td> <td> <ul style="list-style-type: none"> <li>• No identified impacts</li> </ul> </td> </tr> <tr> <td>Landowner (WIAL)</td> <td> <ul style="list-style-type: none"> <li>• Ability to pursue generation and storage of low carbon energy</li> </ul> </td> </tr> <tr> <td>Businesses</td> <td> <ul style="list-style-type: none"> <li>• Provides part of the framework for individual businesses to achieve their decarbonisation goals</li> </ul> </td> </tr> <tr> <td>Consent authority</td> <td> <ul style="list-style-type: none"> <li>• Reduced resource, administrative, compliance, and enforcement burden</li> </ul> </td> </tr> </tbody> </table>	Affected Group	Benefits	Existing city, regional, and national community	<ul style="list-style-type: none"> <li>• Security for travel / freight movement</li> <li>• Climate change actions taken</li> </ul>	Future generations	<ul style="list-style-type: none"> <li>• As above</li> </ul>	Iwi/Māori	<ul style="list-style-type: none"> <li>• No identified impacts</li> </ul>	Landowner (WIAL)	<ul style="list-style-type: none"> <li>• Ability to pursue generation and storage of low carbon energy</li> </ul>	Businesses	<ul style="list-style-type: none"> <li>• Provides part of the framework for individual businesses to achieve their decarbonisation goals</li> </ul>	Consent authority	<ul style="list-style-type: none"> <li>• Reduced resource, administrative, compliance, and enforcement burden</li> </ul>	<p>The information provided during the processes to establish WIAL’s designations is considered sufficient for the purposes of this assessment.</p> <p>The need to act on climate change, including via carbon neutrality / decarbonisation, is an imperative part of the Airport and Wellington’s future.</p>
Affected Group	Costs																														
Existing local community	Adverse effects on: <ul style="list-style-type: none"> <li>• Visual amenity from renewable energy infrastructure</li> </ul>																														
Future generations	Risks: <ul style="list-style-type: none"> <li>• Reliability / availability of non-carbon based outcomes</li> </ul>																														
Iwi/Māori	<ul style="list-style-type: none"> <li>• No identified impacts</li> </ul>																														
Landowner (WIAL)	<ul style="list-style-type: none"> <li>• WIAL’s designation conditions require it to report on “decarbonisation”</li> <li>• WIAL will need to pursue carbon neutrality in its own operations</li> </ul>																														
Businesses	<ul style="list-style-type: none"> <li>• Airlines and other Airport based business will need to consider carbon neutrality</li> </ul>																														
Consent authority	Cost of administering the new provisions: <ul style="list-style-type: none"> <li>• providing information</li> <li>• recruiting and training staff</li> <li>• processing consent applications / outline plans</li> </ul> Cost of verifying compliance:																														
Affected Group	Benefits																														
Existing city, regional, and national community	<ul style="list-style-type: none"> <li>• Security for travel / freight movement</li> <li>• Climate change actions taken</li> </ul>																														
Future generations	<ul style="list-style-type: none"> <li>• As above</li> </ul>																														
Iwi/Māori	<ul style="list-style-type: none"> <li>• No identified impacts</li> </ul>																														
Landowner (WIAL)	<ul style="list-style-type: none"> <li>• Ability to pursue generation and storage of low carbon energy</li> </ul>																														
Businesses	<ul style="list-style-type: none"> <li>• Provides part of the framework for individual businesses to achieve their decarbonisation goals</li> </ul>																														
Consent authority	<ul style="list-style-type: none"> <li>• Reduced resource, administrative, compliance, and enforcement burden</li> </ul>																														

		<ul style="list-style-type: none"> <li>• conducting inspections and audits</li> <li>• monitoring</li> </ul> <p>Cost of enforcement:</p> <ul style="list-style-type: none"> <li>• investigating non-compliance</li> <li>• conducting prosecutions</li> </ul>		
<b>Option 1: Proposed approach (recommended)</b>	<b>Costs</b>	<b>Benefits</b>	<b>Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions</b>	
<p><b>Policies:</b></p> <p><u>AIRPZ-P2</u> Allow for Airport Related Activities that provide support to Airport Purposes, including but not limited to those that:</p> <ol style="list-style-type: none"> <li>1. ...</li> <li>2. ...</li> <li>3. Support carbon neutral outcomes, including through transport decarbonisation, and renewable or low carbon energy generation, storage and use.</li> </ol> <p><u>AIRPZ-P5</u> Manage activity, building and structure effects in the Airport Zone, having regard to:</p> <ol style="list-style-type: none"> <li>1. ...</li> <li>2. ...</li> <li>3. ...</li> <li>4. Safety, security and resilience of the Airport (and supporting infrastructure) as an air and land transport hub.</li> <li>5. ...</li> <li>6. ...</li> </ol>	<p>Note that resilience matters are also addressed by other chapters of the Proposed District Plan.</p> <p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>• Visual amenity for some infrastructure</li> </ul> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>• Carbon neutrality expenditure by the Airport and businesses connected to it</li> </ul> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>• Nil</li> </ul> <p><b>Cultural</b></p> <ul style="list-style-type: none"> <li>• Nil</li> </ul>	<p>Greater direction regarding renewable energy and actions related to climate change, compared with status quo.</p> <p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>• Enhanced carbon neutrality and resilience outcomes</li> </ul> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>• Reduced expenditure on carbon based fuels</li> </ul> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>• Enhanced carbon neutrality and resilience outcomes</li> </ul> <p><b>Cultural</b></p> <ul style="list-style-type: none"> <li>• Nil</li> </ul>	<p>It is considered that there is certain and sufficient information on which to base the proposed policies and methods as information was provided during the processes to establish WIAL's designations.</p> <p>The need to act on climate change (carbon neutrality / decarbonisation) is an imperative part of the Airport and Wellington's future.</p>	



<p>7. The need to measure, report and pursue decarbonisation of Airport related activities, including embedded emissions from construction, and activity attracted by the Airport (such as public and private transport).</p> <p><b>Rules:</b></p> <p><u>AIRPZ-R1</u> Airport purposes activities</p> <p><u>AIRPZ-R2</u> Airport related activities</p> <p><u>AIRPZ-R3</u> Non-airport activities</p> <p><u>AIRPZ-R4</u> Buildings and structures</p> <p><b>Other Methods:</b></p> <p>Airport designations: Council responses to outline plans</p>			
<p><b>Effectiveness and efficiency</b></p>	<p><b>Effectiveness</b></p> <p>AIRPZ-P2 and AIRPZ-P5 focus on carbon neutrality / resilience outcomes. They are relevant when considering consent applications by third parties, and in situations where works proposed by WIAL are not within the terms of designation conditions. The relevant rules provide direct links back to considering these policies.</p>		<p><b>Efficiency</b></p> <p>The policy and rule would only apply in situations where the limits of designation conditions are exceeded, or if a designation was ever uplifted. For the most part, this will deliver low cost outcomes to WIAL, the Council and the community, as most activities of WIAL are expected to be facilitated by the designation conditions. The Council will face minor costs in circumstances where an Outline Plan (s76A RMA) is submitted for consideration / comment.</p>
<p><b>Overall evaluation</b></p>	<p>This option is the most appropriate, as it is intended to dovetail with the existence of WIAL's designations, support the primary use of the Airport for Airport Purposes, and achieve desirable outcomes in relation to resilience and carbon neutrality.</p>		
<p><b>Option 2: Status Quo</b></p>	<p><b>Costs</b></p>	<p><b>Benefits</b></p>	<p><b>Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions</b></p>
<p><b>Policies:</b></p> <p><u>Policy 10.2.7.4</u> To require hazardous facilities to be located away from Hazard Areas.</p> <p><u>Policy 10.2.8.1</u> Identify the hazards that pose a significant threat to Wellington and ensure that areas of high hazard risk are not occupied or developed</p>	<p>These matters are only addressed at the policy level, with no applicable rules or assessment criteria. Potential environmental and social costs arise in relation to the relatively weaker direction from status quo provisions.</p> <p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>Visual amenity for some infrastructure</li> </ul> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>Ongoing time and monetary costs to WIAL in seeking resource consents for various activities / structures</li> </ul>	<p>The benefits of the status quo are not as clear as the preferred option, as there is less direction regarding renewable energy and actions related to climate change.</p> <p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>Support for renewable energy</li> </ul> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>Nil</li> </ul> <p><b>Social</b></p>	<p>It is considered that there is certain and sufficient information to understand the implications of continuing with the operative provisions as they have been in place since July 2000.</p> <p>The need to act on climate change (carbon neutrality / decarbonisation) is an imperative part of the Airport and Wellington's future.</p>

<p>for vulnerable uses or activities.</p> <p><u>Policy 10.2.8.2</u> Ensure that critical facilities and lifelines are not at risk from hazards.</p> <p><u>Policy 10.2.1.4</u> Encourage energy efficiency and the development and use of renewable energy within the Airport and Golf Course Recreation Precinct.</p> <p><b>Rules:</b></p> <ul style="list-style-type: none"> <li>• No rules applicable to carbon neutrality / renewable generation</li> <li>• Hazard rules only in relation to the management of hazardous substances</li> </ul> <p><b>Other Methods:</b></p> <p>Nil</p>	<p><b>Social</b></p> <ul style="list-style-type: none"> <li>• Nil</li> </ul> <p><b>Cultural</b></p> <ul style="list-style-type: none"> <li>• Nil</li> </ul>	<ul style="list-style-type: none"> <li>• Support for hazards management</li> </ul> <p><b>Cultural</b></p> <ul style="list-style-type: none"> <li>• Nil</li> </ul>	
<p><b>Effectiveness and efficiency</b></p>	<p><b>Effectiveness</b></p> <p>None of the operative policies refer to the 'primary function of the Airport', which is a term defined by the operative plan – and equivalent in intent to 'Airport Purposes' under the PDP. Operative rules do refer to the Airport's primary function, but the lack of policy support means this is somewhat less effective.</p>		<p><b>Efficiency</b></p> <p>The status quo policy and rules would only apply in situations where the limits of designation conditions are exceeded, or if a designation was ever uplifted. The Council will face minor costs in circumstances where an Outline Plan (s76A RMA) is submitted for consideration / comment.</p>
<p><b>Overall evaluation</b></p>	<p><b>Effectiveness</b></p> <p>Major sections of the operative district plan rules (under 11.1.1) relate to matters that are now addressed by other chapters of the proposed district plan. Noise is a significant example, with the matters covered by Rules 11.1.1.1 to 11.1.1.9 now covered by the rules and standards of the PDP Noise chapter. The status quo, with respect to Airport focused policies and rules, is now very much out of step with the National Planning Standard approach and other matters such as hazardous substances management. In those respects, the status quo is not an effective approach.</p>		

## 11.0 Conclusion

This evaluation has been undertaken in accordance with section 32 of the RMA in order to identify the need, benefits and costs and the appropriateness of the proposal having regard to its effectiveness and efficiency relative to other means in achieving the purpose of the RMA. The evaluation demonstrates that this proposal is the most appropriate option as it:

- Is complementary with WIAL's designations, which did not exist for the current provisions
- Is consistent with the framework provided by the National Planning Standards
- Deals with relevant matters identified during draft district plan consultation and the designation processes
- Is future focussed in addressing climate change through carbon neutrality

Development of the Airport Zone provisions recognises that:

- a) The Airport is existing, regionally and nationally significant infrastructure.
- b) It is reasonable to recognise and plan for growth in air traffic and consequent development within the zone.
- c) Designations are now in place that recognise and provide for the ongoing existence and growth of the Airport.

For these reasons, the Airport Zone provisions (and related provisions in other chapters) reflect the nature of development facilitated by the WIAL designations and their associated conditions.

However, designations only apply to the activities of the requiring authority (WIAL). For that reason, the Airport Zone provisions must also manage third party activities within the zone. In addition, the provisions must allow for the unlikely but possible circumstance of the designations being uplifted. If that were to happen, the district plan would still need to manage ongoing Airport activities. In other words, the situation would be the same as has existed until recently under the operative district plan, without designations in place.

To a large extent, the provisions of the proposed district plan represent the status quo; they are very similar to the objectives, policies, rules and standards of the operative district plan. The main difference lies in allowing for an extension of aircraft taxiing and parking into the new East Side precinct – which is currently occupied by the southern half of Miramar golf course.

In addition, the designations or district plan manage the external amenity effects of existing and future activities / buildings. In the case of WIAL's own development, the parameters of those effects are set by designation conditions. In the case of third party activities and buildings, the parameters of effects (and the potential need for resource consent) are set by district plan rules and standards. And, If WIAL's proposed activities or built development would exceed the limits of designation conditions, then those activities or structures are then subject to district plan provisions and the need for resource consent

## Appendix 1: Feedback on Draft District Plan 2021

Who	Feedback Received	Response
WIAL, BARNZ	<p>Reliance on designation for definition of Airport Purposes is inappropriate.</p> <p>Queenstown district plan approach should be reviewed and considered for adoption ('Airport Related' and 'Non-Airport Related' activities).</p>	<p><b>Changes made for the following reason/s:</b></p> <p>Definitions added for Airport Purposes, Airport Related Activities, and Non-Airport Activities – with objectives, policies and rules reflecting those distinctions.</p>
WIAL, BARNZ	<p>Insufficient recognition of the Airport's regional and/or national significance, often referencing RPS Objective 10 and RPS Policy 8 which require district plans to include objectives and policies that 'recognise and protect' 'Regionally Significant Infrastructure'.</p> <p>Strategic City Assets and Infrastructure provisions identified as being unclear with respect to how the Airport is treated.</p>	<p><b>Changes made for the following reason/s:</b></p> <p>Airport chapter objective highlights the 'purpose of the Airport Zone' as being to recognise and protect the Airport as locally and regional, significant infrastructure.</p> <p>Infrastructure chapter provisions amended to exclude activities that fall under the definitions of Airport Purposes or Airport Related Activities. Airport chapter refers to the Infrastructure chapter, noting this exclusion.</p>
WIAL, BARNZ, Guardians of the Bay, Z Energy	<p>Greater clarity sought on the relationship between the airport designation and district plan standards.</p> <p>Draft Airport chapter cross referenced the purpose and conditions of unsettled (subject to appeal) Airport designations as assessment criteria.</p> <p>Greater clarity sought on how Airport zone provisions relate to third party activities.</p>	<p><b>Changes made for the following reason/s:</b></p> <p>Airport designations have now been settled through Environment Court mediation. References in the chapter amended to reflect that fact.</p> <p>Distinctions made in objectives, policies and rules for Airport Purposes, Airport Related Activities, and Non-Airport Activities so that there is more clarity about how the management framework is</p>

Who	Feedback Received	Response
		<p>applied – including in relation to third parties.</p> <p>Airport chapter provisions clarified so that they are not reliant on the existence of designations.</p>
WIAL, BARNZ	Lack of provision for Airport safety concerns in the Light chapter.	<p><b>Changes made for the following reason/s:</b></p> <p>Amendment made to Light chapter</p>
WIAL, Z Energy	Lack of provision for earthworks of third parties as permitted activities within the Airport Zone.	<p><b>Changes made for the following reason/s:</b></p> <p>Amendment made to Earthworks chapter rule.</p>
Waka Kotahi	Need greater emphasis on public transport links to Airport.	<p><b>Changes made for the following reason/s:</b></p> <p>Further emphasis placed on public transport by objectives, policies and assessment criteria.</p>