

**SUBMISSION BY PAPA RERERANGI I PUKETAPU LTD ON
NPDC'S PROPOSED DISTRICT PLAN**

To: New Plymouth District Council
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Submitter Details

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Trade Competition

Can you gain an advantage in trade competition in making this submission? Yes No

Are you directly affected by an effect of the subject matter of the submission that:

- (1) Adversely affects the environment; and
(2) Does not relate to trade competition or the effects of trade competition. Yes No

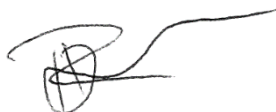
Council Hearing

Do you wish to be heard in support of your submission? Yes No

If others make a similar submission would you consider presenting a joint case with them at a hearing?
Yes No

Submission

The submission points, reasons and decisions sought are set out in the attached document.



Signature of the person making submission
or the person authorised to sign on behalf of the
person making submission

22 November 2019
Date

Introduction & Background

New Plymouth Airport (the Airport) operates as a commercial entity managed by Papa Rererangi i Puketapu, a Council Controlled Trading Organisation. New Plymouth District Council is the sole owner of the Airport.

The Airport is the aviation hub for the Taranaki region and is the fourth-busiest regional airport in New Zealand and the ninth busiest in the country overall (including international airports).

The Airport plays a significant role in facilitating access, trade, tourism and economic activity locally, regionally and nationally. The Airport contains critical infrastructure assets including sealed and unsealed runways, taxiways, aprons, passenger terminals, aircraft hangars, carparking areas, roading and underground utilities. The site also contains critical aviation related operations including Air Ambulance services, heliports, air traffic control and navigational aids, refuelling services and significant areas of land and buildings to serve commercial tenants. All of these facilities are situated on land at the Airport designated within the District Plan.

Average annual passenger growth rate is anticipated to be 5% per annum and in the period from 2018 to 2038 air passenger volume through New Plymouth is expected to grow from 430,000 to 1,200,000¹. A new terminal building is currently under construction to cater for this growth and improve the customer experience.

Planning Policy Context

The Taranaki Regional Policy Statement, which the District Plan must 'give effect' to or in other words implement, recognises the vital role and critical service that the Airport provides the regional community. The Airport is regionally significant infrastructure in this respect, thereby rendering the following RPS provisions relevant:

INF Policy 1: Provision will be made for the efficient and effective establishment, operation, maintenance and upgrading of network utilities and other physical infrastructure of regional significance (including where this is of national importance) and provision for any adverse effects of their establishment to be avoided, remedied or mitigated as far as is practicable.

INF Policy 2: The adverse effects of subdivision, use and development on the safety, efficiency, operation, maintenance and upgrading of the region's network utilities and on other physical infrastructure of regional significance (including where this is of national importance) will be avoided or mitigated.

Safeguarding/Future-proofing the Airport Runway

At 1310m long the New Plymouth Airport main sealed runway is the shortest of the metropolitan runways in New Zealand. The ability to extend the existing sealed runway to a length and width that safeguards future growth and demand for larger aircraft is constrained or at risk due to:

1. Limited land that is currently designated within the District Plan for airport purposes;
2. Physical barriers including:
 - a. The proximity of an eroding coastline to the existing runway. Predicted rates of coastal erosion indicate that the coastline will encroach and impact upon the operability of the western end of the runway within a 100 year timeframe;

¹ Based on the medium growth scenario reported in the *New Plymouth Airport Year 2038 Aircraft Movements Forecast*, (April 2018, Astral Aviation Consultants Ltd).

- b. The Waiongana River and its tributary to the east and south
3. Areas of significant cultural and historical value to Te Atiawa and Puketapu hapū including Urupa and Waahi Taonga to the east, west and south
4. Regulatory uncertainty concerning the extent of Runway End Safety Area (RESA) requirements that will be required in the future.

Other matters that present challenges to the Airport when considering alternatives to extending the runway on its current alignment include:

1. Options to realign the runway on a north-east/south-west alignment or pave and seal the north/south aligned grass runway will require property acquisition and potentially significant adverse cultural and noise effects.
2. Encroaching residential development from the south west (especially associated with the residential development of "Area Q") is putting increased pressure on the Airport and will potentially limit or Airport preclude alternatives and/or expansion in the future.

Runway Options and Multi-Criteria Analysis

During 2019 the Airport has engaged a range of specialists including representatives from Te Atiawa and Puketapu hapū to consider alternative runway alignment options. This process has been run as a collaborative multi-criteria analysis (MCA). The preliminary conclusion of the MCA is that extending the runway on its current alignment to meet anticipated future needs presents many challenges and is potentially "unconsentable" under the RMA (1991) due to a number of unacceptable adverse effects on cultural and archaeological values as well as uncertainty regarding the resilience of an option that extends towards an eroding coastline.

The predicted rate of coastal erosion strongly suggests that it is prudent for the Airport to take a long term view and to consider and plan for an alternative future runway on a north-east/south-west alignment and for the Airport to advocate protection of that land for which it does not own for future runway use should it be required. The outcome of the MCA process has highlighted the strategic importance to the Airport, and the region, of the rural land between Area Q and the Airport. The MCA process has highlighted that should the Airport require a north-east/south-west runway alignment in the future that the residential land planned for Area Q will be impacted by noise and amenity effects from Airport operations.

The Airport therefore strongly supports the retention of the Rural Productive Zoning for the land between Area Q and the Airport within the proposed plan. Furthermore, the Airport recommends that NPDC establish overlay provisions within the proposed plan that prevents incompatible development such as residential housing that would preclude the Airport from using the land in the future.

Airport Special Purpose Zoning & Precinct Plan

The Airport has been closely involved with the development of the proposed special purpose zoning, precinct plan and associated objectives, policies and rules for the Airport.

The Airport is concerned to ensure that the proposed plan enables the safe and efficient operation of the Airport and that the use and development of land around the Airport is controlled such that reverse sensitivity effects are avoided.

The specific submissions and the decisions sought for NPDC's Proposed District Plan are as follows:

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission	Relief Sought
Strategic objective UFD-21	Support	The Airport support the protection of the Airport Major Facility Zone	Retain in full
Objectives AIRPZ01-03	Support	The Airport support the identification and protection of the New Plymouth Airport	Retain in full
Policy AIRPZ-P1	Support	The Airport support this policy in full.	Retain in full
Policy AIRPZ-P2	Support	The Airport support this provision in full	Retain in full
Policy AIRPZ-P3	Support	The Airport supports this provision in full.	Retain in full
Policy AIRPZ – P4	Oppose in part	The Airport supports the premise of this policy but seeks that item 3 (c) is deleted as it is considered that adjacent zones may have activities that are incompatible or have potential reverse sensitivity effects in relation to the Airport operations.	Amend Policy AIRPZ-P4 to delete item 3 (c)
Policy AIRPZ – P5	Oppose in part	The Airport supports this policy but seeks that incompatible activities which are Maori Purpose and integrated retail activities are detailed from this list. This is because the Airport Zone includes existing Maori activities that need to be recognised and provided for. In terms of integrated retail activities it is considered these activities may be 'potentially compatible' and be inserted in Policy AIRPZ-P4.	Amend Policy AIRPZ-P5 to delete incompatible activities items 3 and 4. Insert item 3 into Policy AIRPZ-P4 and insert item 4 into Policy AIRPZ-P3.
Policy AIRPZ-P6	Oppose in part	Support policy but the Airport would like to see this extend beyond 'adjacent' to 'surrounding environment' to encompass activities in a wider perimeter than that identified by 'adjacent'.	Amend Policy AIRPZ-P6 to state:

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission	Relief Sought
			Ensure that any new sensitive activities seeking to establish adjacent <u>within surrounding environment</u> to the Airport Zone...
Policy AIRPZ-P7	Support	The Airport supports this policy	Retain in full.
Policy AIRPZ-P8	Oppose in part	The Airport opposes Policy AIRPZ-P8 particularly item 2 and 5 as the activities related to the airport are accepted to have potential effects on adjacent sensitive activities and the strategic importance of the Airport needs to be protected.	Delete items 2 and 5 of this policy.
Policy AIRPZ-P9	Support	The Airport supports this policy.	Retain in full
Policy AIRPZ-P10	Oppose in part	The New Plymouth Airport support public access but want this restricted to the Landside Facilities and Operational Area only,	Amend policy to state: Encourage public access to the New Plymouth <u>Airport Landside Facilities and Operational Area only</u> and...
Rules PREC1 – R1 – R9	Support	The Airport support these provisions in full. The Airport wants to retain the ability to develop as a commercial hub in the future and this may include activities listed in the discretionary status. The Airport support the proposed resource consent path.	Retain in full.
Rules PREC1 – R10, R11, R16, R17 and R18	Support	The Airport supports the non-complying status of these activities	Retain in full
Rules PREC1 – R12, R13, R14 and R15	Oppose	The Airport seeks that these activities are listed as discretionary activities rather than non-complying activities within area (1) of the precinct plan.	Move the following activities to be listed as discretionary not non-complying activities: R12 – Integrated retail services; R14 – Business service activities; and R15- Commercial service activities And move the following activity to be permitted in all areas of the precinct R13 – Maori purpose activities

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Rules PREC1- R19 – and PREC1 – S1	Support		Retain in full.
PREC1- Figure 85 New Plymouth Airport Precinct Map	Oppose in part	<p>The Airport seeks minor amendments to the map, these are to delete items 1, 2 and P.</p> <ul style="list-style-type: none"> • item 1, is not necessary to be identified; • item 2 – to delete. Item 2 refers to a tenant and is not necessary to be shown. <p>item P – not necessary to be shown on the map.</p>	To delete symbols 1, 2 and P on the map.
Airport retail and commercial activities definition	Oppose in part	The Airport supports this definition but does not want this definition to be limited to the listed activities.	<p>Amend definition to state:</p> <p>...the New Plymouth Airport and include (<u>but not limited to</u>):....</p>
Objective NOISE-01, 02 and 03	Oppose in part	The Airport activities make noise that extend beyond the boundary of this zone and it is considered these objectives needs to acknowledge this.	<p>Amend objectives NOISE 01, 02 and 03 to include the following exemption:</p> <p><u>“except noise associated with airport operations and aircrafts in flight”</u></p>
Policies NOISE P1 – P4	Oppose in part	These policies don’t adequately reflect the airport operations and activities.	<p>Amend to insert new policy which states:</p> <p><u>NOISE-P5</u> <u>Noise within the Airport Flight Path Surface and Noise Control Boundary are acknowledged to create noise effects that may not be consistent with the underlying zone and activities. Noise associated with airport operations and aircraft within these features are exempt from Policy NOISE P1 – P4</u></p>
NOISE rule summary	Support	Aircraft being operated during a flight are exempt from the noise rules and effects standards.	Retain in full
Rule NOISE S1 (7)	Support	The Airport support the noise provisions for the Airport Zone	Retain in full

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Rule NOISE S4 (1)	Oppose in part	<p>The Airport control boundary in item (1) does not match the notation shown on the planning maps being identified as 'Noise Control Boundary' these need to match. The provision is supported in full.</p> <p>The Airport would also like the reference to a new building removed from this provision and insert a new provision stating that any new noise sensitive activity within the Noise Control Boundary is a Non-Complying Activity.</p>	<p>Amend reference to (1) Airport control boundary to state "<u>Noise Control Boundary</u>".</p> <p>Delete noise sensitive activity or noise sensitive in a new building and add new NOISE S5 non-complying standard to state that any new building with a noise sensitive activity within it as a non-complying activity.</p>
Airport Noise Contours		<p>The Airport seeks that the 50dB noise contour around the existing Airport be imposed on the planning maps in addition to the Area Q Structure Plan. Within the 50dB and 55dB noise contours, there is the potential for reverse sensitivity effects to occur, as signalled in the Area Q policy and rule framework, therefore making this transparent to plan users is appropriate via the main planning maps.</p>	<p>Impose the 50dB noise contour around the existing Airport be imposed on the planning maps in addition to the Area Q Structure Plan</p>
Indicative Airport Noise Contour		<p>The Airport considers a precautionary approach is required in relation to the potential future realignment of the runway. This being the base, the Airport seeks that an indicative outer noise contour be imposed on the planning maps and Area Q structure plan to ensure the potential for runway realignment is not compromised.</p>	<p>Include an indicative outer noise contour for a realigned runway.</p>
Special Purpose – Future Urban Zone (Area R (Airport Drive))	Oppose	<p>The Airport oppose the location of the Future Urban Zone in close proximity to the Airport. The Airport does not want noise sensitive activities located within close proximity to the Airport.</p> <p>The Airport would support non noise sensitive activities being located within this future urban zone eg Industrial.</p>	<p>Delete this Future Urban Zone from the Proposed Plan or indicate it will exclude noise sensitive activities occurring in the future.</p>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission	Relief Sought
DEV1-01 - 03	Oppose	The Airport opposes urban development within Stage 2 and stage 3E of the Area Q structure plan given potential reverse sensitivity effects associated with the New Plymouth Airport.	The Airport wants to see the objectives amended to recognise the proximity of this area to the Airport and potential reverse sensitivity effects.
DEV1 – P4	Oppose in part	The Airport want to see DEV1 – P4 (3) include reverse sensitivity effects associated with the New Plymouth Airport.	Amend item (3) to include reverse sensitivity effects associated with adjacent zone being the Airport Zone.
DEV1 – P6	Oppose in part	The Airport support the premise of this policy but would like to avoid noise sensitive activities establishing at a residential scale within stage 2 and 3E of the Area Q Structure Plan.	Retain this policy in relation to Stage 1 of Area Q and avoid residential development occurring within Stage 2 and 3E.
DEV1 – R3	Support		Retain in full
DEV1-R7	Oppose	The Airport does not want any subdivision or development for noise sensitive activities within the 50dBA Airport Noise Contour Boundary.	Make any subdivision or development within the 50dBA for noise sensitive activities a non-complying activity.
DEV1- R12	Oppose	The Airport does not want any subdivision or development for noise sensitive activities within the 50dBA Airport Noise Contour Boundary.	Make any subdivision or development within the 50dBA for noise sensitive activities a non-complying activity.
DEV1-R16	Support	The Airport supports the retention of Stage 3E as a Rural Production Zone	Retain in full.
DEV1- R17	Oppose	The Airport does not want any subdivision or development for noise sensitive activities within the 50dBA Airport Noise Contour Boundary.	Make any subdivision or development within the 50dBA for noise sensitive activities a non-complying activity.
DEV1- R18	Oppose	The Airport does not want any subdivision or development for noise sensitive activities within the 50dBA Airport Noise Contour Boundary.	Make any subdivision or development within the 50dBA for noise sensitive activities a non-complying activity.
Area Q Guidance Note – Structure Plan Guidance: New Plymouth Airport	Oppose in part	The Airport does not want any subdivision or development for noise sensitive activities within the 50dBA Airport Noise Contour Boundary.	Make any subdivision or development within the 50dBA for noise sensitive activities a non-complying activity. Identify the 50dBA area on the planning map and structure plan area.
Rural Production Zone	Support	The Airport support the land between the Airport Zone and Area Q and Area R being retained as Rural Production Land.	Retain in full.

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Sites of significance to Maori	Support	<p>Sites identified and mapped on the New Plymouth Airport Site are supported and their extents shown. These are:</p> <p>Site 765; Site 2009; Site 492 (clarification of correct location and extent); Site 2008; Site 2007; Site 2006; Site 493; Site 421; Site 462; and Site 2589.</p>	Retain in full
VIEWES-01 and VIEWES -P1	Support	The Airport supports the viewshaft down Airport Drive towards Taranaki Mounga.	Retain in full
VIEWES-S1	Support	The Airport supports the viewshaft down Airport Drive towards Taranaki Mounga.	Retain in full
Objective TRAN-O1 - O5	Support	The Airport supports these objectives TRAN-O1, O2, O3, O5 and O5 and the identification and protection of incompatible activities which may result in reverse sensitivity effects and/or conflicts (TRAN-O5)	Retain in full
Policies TRAN-P1 - P7, P9 – P19	Support	The Airport supports these Policies and the protection of the New Plymouth Airport flight Path Surface in Trans-P2 (2)	Retain in full
TRAN-P8	Oppose in part	The Airport support the premise of this policy but would like to avoid noise sensitive activities are appropriately located and separated from the Airport Zone	The Airport wants to see this policy amended to recognise the proximity of sensitive activities to the Airport and potential reverse sensitivity effects.
RULES TRAN-R1– R10	Support	The Airport supports these Rules and the protection of the New Plymouth Airport flight Path Surface in Trans-R2 and TRAN-Figure 1 – New Plymouth Airport Flight Path Surfaces.	Retain in full

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TRAN – Table 1 – High Trip Generator Thresholds	Support	The Airport supports the threshold for the Activity in item 1.	Retain in full
Effects Standards TRAN-S1 – S25	Support	The Airport supports these Effects Standards and associated tables.	Retain in full
OBJECTIVES LIGHT-O1 and O2	Support	The Airport supports these Objectives LIGHT-O1 and O2.	Retain in full
POLICIES LIGHT-P1 and P2	Oppose in part	The Airport supports these Policies LIGHT-P1 and P2 in principal, however the Airport activities produce light that extend beyond the boundary of this zone and it is considered these policies needs to acknowledge this.	Amend Policies LIGHT-P1 and P2 to include the following exemption: <u>“except light associated with airport operations and aircraft”</u>
RULES LIGHT-R1	Oppose in part	The Airport activities produce light that extend beyond the boundary of this zone and it is considered these rules needs to acknowledge this.	Amend rule LIGHT-R1 include the following exemption: <u>“4. light associated with airport operations and aircrafts”</u>
EFFECTS STANDARDS LIGHT-S1	Oppose in part	The Airport activities produce light that extend beyond the boundary of this zone and it is considered these effects standards needs to acknowledge this.	Amend effects standard LIGHT-S1 include the following exemption: <u>“except light associated with airport operations and aircrafts”</u>
Subdivision Chapter and Rural Production Zone Provisions		In order to enable the Airport to upgrade, and protect it from potential reverse sensitivity effects, there is a need to protect it from potential subdivision and residential type land uses on land Primary Production land between Area Q and the Airport.	Include a Non-Complying activity status for any subdivision and residential type land use activity on Rural Production land between Area Q and the Airport.