

**BEFORE THE INDEPENDENT HEARINGS PANEL AT WELLINGTON CITY | MUA
NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHAKE NGĀMOTU O TE WHANGANUI-
A-TARA**

UNDER THE Resource Management Act 1991

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

HEARING TOPIC Hearing Stream 6- Airport Zone

STATEMENT OF EVIDENCE of Guardians of the Bays Inc



1. Introduction

- 1.1 My name is Yvonne Weeber I am the Chair of Guardians of the Bays Inc (GOTB).
- 1.2 GOTB is an incorporated society that represents concerned Wellington residents working to reduce the adverse effects that arise from Wellington airport on the land surrounding the airport made up of predominately pre-existing residential neighbourhoods and the sea at either end of the airport runway.
- 1.3 GOTB objectives are to reduce the adverse effects that arise from Wellington airport including proposed runway extensions, expansions, increased aircraft and land transport movements and other related activities on the environment. The adverse effects may include but are not limited to coastal reclamation, emissions, noise, stormwater, reduction of visual and landscape amenity and neighbourhood disruption.
- 1.4 In June 2022 GOTB were part of a mediated Environment Court agreement for the conditions on the Man Site Area designation and the East Side Area designation (the expansion of the Wellington Airport into the southern section of Miramar Golf Course).
- 1.5 GOTB made submissions and further submissions on the Proposed District Plan.
- 1.6 This statement relates to Stream 6 – Airport Zone.
- 1.7 GOTB would like to thank the Council Officers for their thorough evaluation and recommendations of submissions in Hearing Stream 6 and the ongoing administrative support of these hearings.
- 1.8 GOTB have reviewed the documents supplied for Hearing Stream 5 including:
 - i. Wellington City Councils (WCC) Section 42 Analysis Report prepared by Joe Jefferies for Wellington City Council relating to the Part 3 Area Specific Matters of the Airport Zone;

- ii. Wellington City Council Appendix A Recommended Amendments to Provisions (WCC Appendix A) with track with recommended amendments to provisions by the council;
 - iii. Statements of Evidence from WCC experts and rebuttal statements.
 - iv. Relevant submitters material including statements of evidence, submitter statements and rebuttal statements.
- 1.9 GOTB are not opposed to the Airport Zone as a special purpose zone.
- 1.10 GOTB seeks clarity of the zone provisions and the mapping of the western Bridge Street boundary in relationship to the Designation WIAL4 (Wellington Airport Main Site Area).
- 1.11 Wellington International Airport Ltd (WIAL) added confusion to the submission process with the untracked full amended 'New' Airport Zone. GOTB are glad that a new tracked change version was supplied to Wellington City Council on the 17 October 2023. However, we are disappointed that this has meant that submission points were not developed and a thorough analysis of WIAL's proposed changes could not be undertaken by GOTB.
- 1.12 Where GOTB have proposed changes to the Wellington City Council Appendix A Recommended Amendments(WCC Appendix A) to Provisions we have done this in [*blue italics underlined text*](#).
- 2. Airport Zone – General**
- 2.1 GOTB supports the WCC Section 42A report assessment on definitions as relating to the Airport Zone. We agree the distinction between Airport and Airport Related activities should be maintained in both policy and definition. We agree that there are distinct differences between activity categories in both their effects and necessary operation of Wellington Airport.
- 2.2 GOTB is of the view that there is no harm in repetition of the designation within the Airport Zone. This repetition allows for the community to understand the zone better in a way that everyone knows what is happening. We agree with the WCC Section 42A report where Mr Jeffries of “the issue as being more a matter of ensuring that the zone provisions and designations each appropriately perform their respective roles”.
- 2.3 GOTB considers the retention of the Obstacle Limitation Surface definition is important for the community to understand and clarity of the limitations of development around the airport.
- 2.4 The Airport Zone is in the coastal environment and surrounded by sea both the north and south. GOTB considers the Airport Zone should remain within the Coastal Environment Overlay.
- 3. Airport Zone – Introduction**
- 3.1.1 GOTB has no issue with the mapped extent of the Airport Zone. But we know the Airport Zone does not encompass all WIAL's designations.
- 3.1.2 As noted in WIAL's evidence as seen in Kirsty O'Sullivan's 5 February evidence “Almost all of the Airport Zone is also designated by WIAL for airport and airport related purposes. The only exceptions to this include the Rongotai Ridge area to the north of the site and some of the Bridge Street properties.”
- 3.1.3 The Bridge Street area is presently street level grass considerably lower than the existing runway stip. Though this land may have practical constraints of the Obstacle Limitations Surface and future “CAA/ICAO compliance requirements”

relating to runway strip width it is a very different area than the existing runway strip. It is also no in WIAL's 2040 Masterplan. Therefore, it would appear to GOTB that this is a reason to create a new precinct for an area in change between its present use to its future use.

4. Airport Zone – Objectives

4.1 AIRPZ-O1: Purpose of the Airport Zone

- 4.1.1 GOTB disagrees that Wellington Airport is nationally significant infrastructure with its constrained site and low passenger volumes. However, the present National Policy Statement on Urban Development appears to give it this status.

4.2 AIRPZ-O2: Development of the Airport Zone

- 4.2.1 GOTB considers the need for the airport zone to support the enablement of carbon neutral development as very important and needs to be considered through a range of objectives including *AIRPZ-O2: Development of the Airport Zone*.
- 4.2.2 GOTB fully supports the need for a higher standard of design for the large buildings and structures that are adjacent to or visible from the public domain. The community was shocked, and frustrated by the extremely large grey hanger that was constructed on Tirangi Road. We do not want this type of large bulky low quality airport building being constructed directly on public road frontage again and being able to be seen in the public domain. The broad lens of 'public domain' is important as extremely large bulky buildings can be seen from such a wide area. Reducing the wording to public roads as proposed by WIAL does not for example include the Rongotai College, Lyall Bay, Evans Bay, Leonie Gill walkway, Tirangi Road walkways and Strathmore Park walkways.
- 4.2.3 GOTB is of the view that WIAL and other users within the Airport Zone should construct high quality buildings and structures with a high-quality appearance no matter what scale and location they have. We therefore oppose WIAL's proposed changes to AIRPZ-O2

4.3 AIRPZ-O3: Compatibility of other activities

- 4.3.1 GOTB accepts the changes proposed for AIRPZ-O3 in WCC Appendix A. We agree with the WCC Section 42A report where Mr Jeffries points out that the Airport Zone and the operations on the airport do produce conflicts between the airport zone activities and the surrounding areas predominately residential use.

4.4 AIRPZ-O4: Adverse effects generated by activities

- 4.4.1 The changes proposed in the WCC Section 42A report and WCC Appendix A by Mr Jeffries fundamentally change this objective. GOTB therefore proposes adding the effects on the amenity of the surrounding area which is predominately residential.

The Airport's operational and functional requirements are provided for while ensuring the adverse effects of Airport and Airport related activities on the environment including the effects on the amenity of the surrounding area are avoided, remedied, or mitigated.

~~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.~~

4.5 *AIRPZ-O5: Carbon neutrality-*

- 4.5.1 GOTB's agree with the WCC Section 42A report by Mr Jeffries that the term 'options' is better for this objective than 'operations'. 'Options' is about choice, where 'operations' is about performance and limiting functions. In the next ten years low carbon land transport options will increase and this objective needs to expand rather than limit the potential of low carbon transport.

4.6 *AIRPZ-O6: Airport resilience*

- 4.6.1 The airports resilience is both through its air and land transport connections. This objective should clearly state the airport zone is an air and land transport hub. Without this you are relying on only having 'other transport links' with no clear idea of what this actually means.

5. Aiprort Zone – Policies

5.1 *AIRPZ-P1: Airport purposes activities, buildings and structures*

- 5.1.1 GOTB supports the retention of AIRPZ-P1: Airport purposes activities, buildings and structures as proposed by WCC in the Section 42A report. We agree that there is value in maintaining a policy and distinction between the definition of Airport and Airport Related Activities.

5.2 *AIRPZ-P2: Airport related activities, buildings and structures*

- 5.2.1 GOBT supports the WCC Section 42A report to retain AIRPZ-P1 and AIRPZ-P2 as separate policies.

5.3 *AIRPZ-P3: Non-airport activities*

- 5.3.1 GOTB opposes the removal of number 3 in this policy as this is about the non-airport activities compromising the carbon neutral outcomes of the Airport.
- 5.3.2 GOTB supports the WIAL clause 4 addition of "~~Has a significant adverse effect on the economic viability of Kilbirnie or Miramar Centre Zones~~". We consider the non airport activities especially as the Main Site Area and West Side Precinct have economic impacts on Kilbirnie and Miramar.
- 5.3.3 GOTB supports the remaining *AIRPZ-P3* as set out in WCC Appendix A

5.4 *AIRPZ-P4: Airport Character*

- 5.4.1 A large amount of Airport Zoned land on Bridge Street on the western side of the Airport runway is not within the designations of the Main Site Area. This land at present is in grass or one residential dwellings. At present this is within the 'Airside Precinct' and was purchased under the Airport Noise Mitigation Programme. GOTB is supportive of these purchases.
- 5.4.2 The land from Jo Lesters evidence to have a future as a civil aviation compliance related to the runway. However, a lot could happen to create civil aviation

complains including filling the area up to the present runway height and security fencing.

5.4.3 GOTB considers provisions for how any civil aviation compliance impacts on the surrounding residential neighbourhood should be considered for Bridge Street within the Airport Zone. To do this effectively GOTB believes a separate 'precinct' should be created to enhance the character of Bridge Street. In addition it should provide design direction within the District Plan as this area is not in any of the airports designations and not in WIAL's 2040 Masterplan.

5.4.4 While we agree removal of the reference to the Urban Design Protocol is appropriate it would be worth considering that the Protocol which Yvonne Weeber helped write includes more than just "the intent of the Centres and Mixed Use Design Guide". The seven urban design qualities from the Protocol include: context, character, choice, connections, creativity, custodianship and collaboration. This is therefore more than mixed use.

5.5 *AIRPZ-P5: Management of effects*

5.5.1 GOTB disagrees in the deletion of clause 7 in relationship to decarbonization of airport related activities including embedded emissions from construction and activity attracted by the Airport (such as public and private transport).

5.5.2 The Bridge Street land, which is out of the designation, could include considerable construction and release of embedded carbon emissions to bring the land up to civil aviation compliance related to the runway. By removing this clause, you are removing the ability to report on this areas future development carbon emissions.

5.5.3 GOTB is of the view that duplication of the designation is not a bad thing and allows the community and everyone to see what is happening and required of any development within the Airport Zone.

6. Airport Zone – Rules

6.1 *AIRPZ-R1: Airport Purposes*

6.1.1 GOTB supports the changes in the WCC in the Section 42A report and WCC Appendix A Recommended Amendments to Provisions.

6.2 *AIRPZ-R2: Airport related activities*

6.2.1 GOTB agrees it is appropriate to retain discretion over Airport Related activities in most areas of the Airport Zone.

6.2.2 GOTB opposes the permitted activity of all airport related activities within the Terminal Precinct as proposed in the Section 42A report and WCC Appendix A Recommended Amendments to Provisions. This is especially concerning in relationship to the removal of the economic viability issues some 'airport related activities' could have on the Kilbirnie and Miramar suburban centres.

6.2.3 For example could a small supermarket be considered an Airport Related Activity that supports the needs of Airport passengers, visitors and employees? Already Wellington Airport has advertised to Wellington to come shopping within its complex with free parking in the weekends.

6.3 *AIRPZ-R3: Non-airport activities*

- 6.3.1 GOTB agrees that the golf course activities are better positioned in this rule.
- 6.3.2 GOTB disagrees that the notification status is removed in relationship to publicly notifying non-complying activity.

6.4 *AIRPZ-RX Maintenance and repair of buildings and structures and AIRPZ-RX Demolition or removal of buildings and structures*

- 6.4.1 GOTB supports the new rules set out in WCC Appendix A. This creates permitted activity rules for the maintenance and repair; and demolition or removal of building and structures within the Airport Zone as set out in the new rules of AIRPZ-RX Maintenance and repair of buildings and structures and AIRPZ-RX Demolition or removal of buildings and structures.

6.5 *AIRPZ-R4: Building and structures*

- 6.5.1 GOTB supports the changes to the Permitted and Controlled Activity Status sections of AIRPZ-R4: Building and structures as set out in WCC Appendix A Recommended Amendments to Provisions.
- 6.5.2 GOTB supports the including construction effects, including earthworks, noise, hours of operation and traffic within the Controlled Activity status matters of discretion. Construction effects can be a major issue to surrounding residential neighbourhoods to Wellington airport.
- 6.5.3 GOTB opposes the removal of the Miramar South Precinct integrated management plan as a reference within the District Plan.
- 6.5.4 GOTB opposes the removal in the Discretionary Activity Status of the 'A building or structure is in the East Side Precinct, Landscape Buffer Area but is not a Controlled Activity under AIRPZ R4.2'.

7. Airport Zone – Standards

7.1 *AIRPZ-S1: Maximum height and location of buildings and structures (except Miramar South precinct and Rongotai Ridge precinct)*

- 7.1.1 GOTB does not support the deletion of the clause “in the terminal precinct, no closer than 20m to an external site boundary” as requested by WIAL. We agree with the WCC Section 42A report regarding this being a trigger for a resource consent to ensure the terminal buildings that are visible from the outside of the airport area are able to be assessed for design quality especially for large buildings. The duplication of this designation condition is appropriate and provides council with enforcement powers.
- 7.1.2 GOTB opposes the deletion of the matters of discretion on effects on existing vegetation. This is particularly relevant in relationship to the West Side Precinct and existing pohutuakwa on Turangi Road and any other remaining vegetation within the Airport Zone.

7.2 *AIRPZ-S2: Maximum height and location of buildings and structures (Miramar South precinct and Rongotai Ridge precinct)*

- 7.2.1 GOTB opposes the removal of the 8,9 and 10 metre building and structure heights in the Miramar South Precinct and the provision of a new 11m building height across the precinct.

7.2.2 GOTB opposes the removal of the Miramar South Precinct integrated management plan as a reference within the District Plan.

7.2.3 GOTB opposes the removal of the assessment criteria on transport, impacts of commercial development, and construction impacts.

7.3 *AIRPZ-S3: Commercial, retail and access restrictions*

7.3.1 GOTB supports WIAL's inclusion of constraints of large format retail within the Miramar South Precinct.

7.3.2 GOTB considers the need for the airport zone to constrain and limit commercial retail and other activities in the Bridge Street area. This area of land is not in the Airports 2040 Masterplan and therefore is unallocated land with no development function at present.

7.3.3 This is especially important as at this point over half this Bridge Street area is not in the Main Site Area designation. This is why we proposed that this area should be limited to open space enhancements with no buildings. At present the development of this area is silent on what should happen to land outside the designations but within the Airport Zone. GOTB has proposed the following wording:

[6. Bridge Street Precinct shall be limited to an open space enhancement area with no buildings.](#)

Dated 16 February 2024

Yvonne Weeber

Chair of Guardians of the Bays