

IN THE MATTER of the Resource Management Act 1991
("Act")

AND

IN THE MATTER of the Wellington City Council Proposed
District Plan

AND

IN THE MATTER of further submissions by the BOARD OF
AIRLINE REPRESENTATIVES NEW
ZEALAND INC ("BARNZ")

**LEGAL SUBMISSIONS ON BEHALF OF
THE BOARD OF AIRLINE REPRESENTATIVES OF NEW ZEALAND INC
IN RELATION TO STAGE 6 – SPECIAL PURPOSE ZONES**

16 FEBRUARY 2024

1. The Board of Airline Representatives of New Zealand Inc (“BARNZ”) provided legal submissions on Stage 5 – Noise which outlined BARNZ’s role and strategic interests in the airport and the planning mechanisms affecting the safe and efficient use of the airport. BARNZ also called evidence from the Executive Director of BARNZ, Ms Cath O’Brien who outlined the background to BARNZ, the importance of Wellington Airport, as well as addressing matters specific to noise. The overview aspects of the legal submissions and evidence provided remain broadly applicable to this hearing.
2. To briefly recap, BARNZ is an incorporated society representing the airlines that operate scheduled international and domestic services utilising airports throughout New Zealand.
3. BARNZ has a history of active participation in planning matters at the major airports in New Zealand. Representing the airlines and associate members, it works with the airports and local and regional councils throughout New Zealand. It also works closely with central government. As the key users of airport infrastructure BARNZ’s focus is on the requirement for supporting infrastructure to ensure the continued safe and efficient operation of airline services. It retains a watching brief in relation to the Airport Zone to ensure that the Zone adequately provides for airline operations and ancillary activities by efficiently managing key activities within the zone. BARNZ generally supports the position of WIAL as advanced by the planning evidence of Ms O’Sullivan, on behalf of Wellington International Airport Limited (“WIAL”). It agrees that flexibility to properly enable forward planning and development is necessary to respond to changing demands that arise at a modern airport.¹
4. BARNZ also supports WIAL’s approach to references to the designations in the Airport Zone.² While it is useful to alert the plan reader to the Airport’s designations, it supports unnecessary duplication of designation conditions.
5. For Stage 6 BARNZ has reviewed the changes to the Airport Zone set out in the Section 42A Report, the further changes proposed by WIAL and the

¹ EIC K O’Sullivan 5 February 2024 at para 17.

² FS 139.155 and 139.156

supplementary evidence of Mr Jeffries which adopts some further changes but otherwise suggests further conferencing.

6. Many of the amendments proposed by the Section 42A Report make the chapter clearer or otherwise more efficiently provide for consent processing within the Airport Zone which, in turn, will promote the efficient operation of the airport. Further amendments have been proposed by WIAL which, from BARNZ's perspective build on and further improve the Chapter. It is noted that Mr Jeffries proposes further discussion / expert conferencing with Ms O'Sullivan, and to the extent this would resolve any outstanding areas of disagreement, this is supported by BARNZ.
7. In summary, BARNZ does not perceive that there is anything in the changes proposed by WIAL that do not support BARNZ's objectives and accordingly, supports the further changes proposed by Ms O'Sullivan.

Gill Chappell

Counsel for BARNZ