

**Before an Independent Hearings Panel of Wellington District
Council**

Under the Resource Management Act 1991

In the matter of the hearing of submissions and further submissions on the
Proposed Wellington City District Plan (**PDP**)

And

In the matter of Hearing Stream 9

SUBMISSIONS ON BEHALF OF WELLINGTON INTERNATIONAL AIRPORT LIMITED

Hearing Stream 9 – Infrastructure and Risks

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- 1.1** These brief submissions are filed on behalf of Wellington International Airport Limited (**WIAL**), a submitter on the Wellington City Council (**WCC**) Proposed District Plan (**PDP**) in relation to Hearing Stream 9 – Infrastructure and Risks.
- 1.2** WIAL has filed evidence in relation to infrastructure and transport matters from:
- (a) Jo Lester, Planning Manager, WIAL;
 - (b) Kirsty O’Sullivan, Partner, Mitchell Daysh Limited.
- 1.3** The Council’s s42A Reports and subsequent supplementary evidence have gone some considerable way to alleviating WIAL’s concerns as set out in its submission and evidence.
- 1.4** In particular, the supplementary evidence has recommended a number of Ms O’Sullivan’s suggested amendments (or similar) to the Infrastructure Chapter’s Introduction, Objective INF-O3 (Adverse effects on infrastructure), Policy INF-P7 (Incompatible subdivision use and development) and TR- S1 (vehicle trip generation thresholds).
- 1.5** At the time of drafting these legal submissions it appears there is only one remaining area of disagreement. This relates to the Coastal Environment sub-chapter and in particular how to treat the area of Natural Open Space zone between Lyall Bay and Moa Point Road that includes the seawalls and other airport related infrastructure.
- 1.6** Mr Anderson appears to have focused on whether the seawall can be considered to be infrastructure in reaching his conclusion not to recommend Ms O’Sullivan’s suggested amendments in relation to this issue.
- 1.7** In my submission his focus is not only incorrect but also overly narrow. The evidence for WIAL clearly outlines the “statutory trail” which shows why the seawalls can be considered as infrastructure. As such it is appropriate that they (and any other airport related infrastructure) are considered as part of the code provided by the Infrastructure chapter. Further just because a seawall is also defined as a “Hard Engineering

Hazard Natural Hazard Mitigation Works” does not mean that it should be excluded from the consenting pathway provided for by the Infrastructure chapter.

- 1.8** In addition Mr Anderson has not considered the wider focus of Ms O’Sullivan’s concerns¹ and suggested amendments² for this area which also relate to other airport related structures that may need to be located in this area. Her suggested amendments are also better aligned with the approach taken by Reporting Officers for Hearing Streams 7 and 8.
- 1.9** Finally it is apparent from the evidence for WIAL presented over a number of hearing streams that this particular area is quite distinct from other Natural Open Space zones, and in my submission the policies and rule framework should reflect that.
- 1.10** I will leave it for Ms O’Sullivan to respond in more detail on this matter at the hearing.



Amanda Dewar
Counsel for Wellington International Airport Ltd

¹ Set out at paragraphs 60 – 66 of Ms O’Sullivan’s evidence

² Starting at p63 of Ms O’Sullivan’s *Appendix A – Marked up Provisions*