

**BEFORE THE INDEPENDENT HEARINGS PANEL AT WELLINGTON CITY I 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 10- Designations**

STATEMENT OF EVIDENCE OF Guardians of the Bays Inc (452)

11 July 2024



1. Introduction

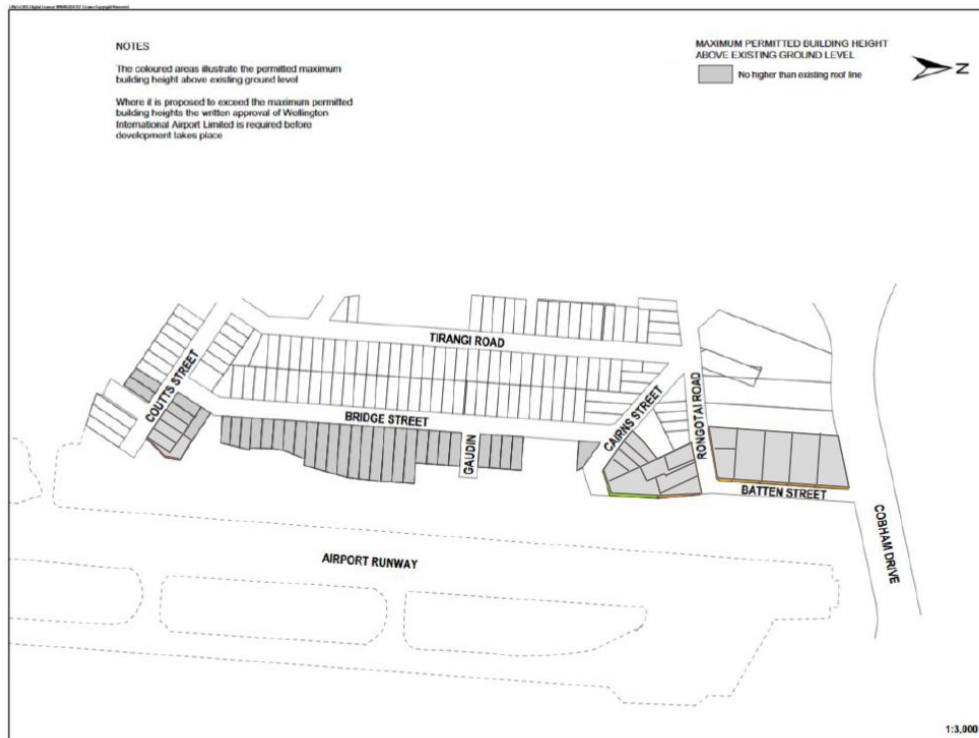
- 1.1 My name is Yvonne Weeber I am the Chair of Guardians of the Bays Inc (GOTB).
- 1.2 GOTB is an incorporated society that represents concerned Wellington residents working to reduce the adverse effects that arise from Wellington airport on the land surrounding the airport made up of predominately pre-existing residential neighbourhoods and the sea at either end of the airport runway. The bays that are referred to Evans Bay and the southern coastline from Lyall Bay to Moa Point.
- 1.3 GOTB has made submissions and further submissions on the Proposed District Plan.
- 1.4 This statement relates to Stream 10 Designations and the Wellington International Airport Ltd (WIAL) designation WIAL1. GOTB has reviewed the documents supplied online for Hearing Stream 10 relating to this designation.

2. Obstacle Limitation Surfaces

- 2.1 Designation WIAL 1 is a roll over designation of G2 with amendments from the Operative Wellington City District Plan. This designation incorporates Obstacle Limitation Surfaces.
- 2.2 Obstacle Limitation Surfaces are theoretical three-dimensional surfaces that exist in the airspace above and around an airport. Obstacle Limitation Surfaces are used as a tool to impose height limitations on buildings, structures and other objects around an airport and within the flight path approach to and take off from an airport. Obstacle Limitation Surfaces regulations come from International Civil Aviation Organization (ICAO) guidance and Civil Aviation Regulations. These regulations ensures that aircraft have a safe obstacle free flight path at a low altitudes into and out of an airport. In 1984 Obstacle Limitation Surfaces were put in Wellington planning documents.
- 2.3 Wellington with its enclosed harbour, steep coastal escarpments, hilltops and pre 1984 built urban environment pose some unique issues for Wellington Airports Obstacle Limitation Surfaces. It would appear that Wellington's landscape and existing built form make it impossible for Wellington Airport to meet all the ICAO guidance and Civil Aviation Regulations.
- 2.4 Guardians of the Bays is concerned that the limitations imposed by the Obstacle Limitation Surfaces in the WIAL 1 designation will have the effect of reducing the development capacity on properties but also increase uncertainty, costs and time of those who wish to pursue development within the Obstacle Limitation Surfaces area. We believe this will occur due to the need to seek Wellington Airports approval on any development above 8m rather than 11m.

- 2.5 We thank Jo Lester for the information on the GIS Tool and WIAL s176(1)(b) Approval Process.
- 2.6 We agree with Mr Whittington counsel for Wellington City Council that one of the issues is the cost to landowners seeking the Airport's permission to build over 8m. This added expense, in getting permission, will reduce potential urban development in these areas. This cost is supported by Natalie Hampson evidence due to notifying WIAL for an evaluation or a potential aeronautical study will add transaction/compliance costs for property owners. This cost may be the reason that there have only been 11 requests for approval since August 2023.
- 2.7 We also don't want the cost being put on Wellington Airport, as per Jo Lester's evidence, having to respond to unnecessary requests for written consent on a proposal. This is when the planning maps show the Obstacle Limitation Surfaces but it extends high above over a property, meaning the designation does not apply. The OLS and Ground Height Difference in the new Wellington City 2024 District Plan: Appeals Version goes a long way to resolve this issue.
- 2.8 We thank Natalie Hampson for her evidence but there are still many questions that we and Kianga Ora have. We therefore support Kianga Ora's submission that:
- a) The Panel consider setting the maximum height limit in condition 1 of the Designation WIAL 1 to 11 m.
 - b) The Panel requests further evidence from the Wellington International Airport Ltd to justify any maximum height limit below 11m.
- 2.9 We agree with Jamie Sirl that terrain shielding should be incorporated into a Geographic Information System Obstacle Limitation Surface Mapping tool as it appears to us that many areas marked with less than 11m clearance have an even larger hill shielding them. We would suggest that building shielding needs to be incorporated in this mapping. This would give a greater level of certainty where approval could be provided thus allowing the property owner or future developer to better understand the constraints and development potential of the site.
- 2.10 Obstacle Limitation Surfaces permission to breach from Wellington Airport needs an efficient approach to assessing proposals that penetrate the OLS combined with decisions that are consistent and based on an assessment of aeronautical safety. Having this information on public record available to the public would allow everyone to understand WIAL's decisions. The past record of decisions would help people in the vicinity of a property understand how their proposal may be considered by Wellington Airport.
- 2.11 We therefore agree with Mr Whittington that an advice note alongside the WIAL designation conditions providing information about Wellington Airports permission process is important for all parties. We ask that this goes further with a clear process, timeframes to process a decision and record available to the public of past decisions made by the airport.

3. Bridge Street East



3.1 My submission stands that “Figure 1: Designation G2 Properties affected by specific height restrictions” makes no sense for the east side of Bridge Street without a height recorded on this figure. Most buildings on east side of Bridge Street have been removed (see Figure 2 and 3) therefore there are no roof lines to build a maximum building height to. We seek that Figure 1 of the Wellington International Airport Designation is amended to specify a height for the grey area (east side of bridge street next to the airport runway).

Figure 2 and 3 Bridge Street East with no houses and limited roof lines.



Dated 11 July 2024

Yvonne Weeber

Chair of Guardians of the Bays