

## PROPOSED DISTRICT PLAN CHANGE 22: WHENUAPAI AIRPORT SPECIAL AREA

(Council, 29 November 2006)

### PURPOSE OF THE REPORT

The purpose of this report is to present to the Council the Proposed Plan Change relating to the creation of a Policy and Special Area Rule framework for Whenuapai Airport in the District Plan and seeks approval from the Council to enable the Proposed Plan Change to be publicly notified.

### BACKGROUND

At its meeting on 17 August 2005, the Council resolved:

- "1 That the Whenuapai Airport report be received.*
- 2. That work commences on a District Plan change for Whenuapai Airbase to:*
  - a) Provide for the existing activities and operations of the New Zealand Defence Force.*
  - b) Provide a resource consent process for establishing a civil and joint use airport operation.*
  - c) Amend the policies and objectives of the District Plan as necessary to protect the commercial/civil airport potential of Whenuapai in accordance with Council's policy that Whenuapai be used in the future for commercial airport activities.*
  - d) Provide for other potential uses, provided that they do not compromise the commercial/civil potential of the land to be used for commercial airport uses.*
  - e) Establish a zone that better reflects existing activities and potential future activities.*
- 3. That the Whenuapai Airport Agenda report and associated resolutions be made public as the Council now decides to proceed with the proposed Plan Change."*

1553/2005

At its meeting on 9 May 2006, the Planning and Regulatory Committee resolved:

- "1. That the Waitakere City District Plan Draft Plan Change: Whenuapai Airport Special Area report be received.*
- 2. That the Planning and Regulatory Committee endorses the draft Plan Change and draft Section 32 Report for the Whenuapai Airport Special Area.*
- 3. That the Planning and Regulatory Committee directs Council staff to make the draft Plan Change and draft Section 32 Report for the Whenuapai Airport Special Area publicly available to enable consultation with the relevant agencies and local groups.*

4. *That the Planning and Regulatory Committee notes that following the completion of the consultation, the draft Plan Change will be presented to the Committee again and approval sought from the Committee for its public notification under Clause 5 of the First Schedule of the Resource Management Act 1991.*
5. *That the Waitakere City District Plan Draft Plan Change: Whenuapai Airport Special Area agenda report and associated resolutions remain confidential until such time as the reasons for confidentiality no longer exist."*

835/2006

Comment was then sought from the public on the Draft Plan Change, and the response from the public is summarised below.

### **STRATEGIC CONTEXT**

A leading strategic priority for Waitakere City Council is the creation of a strong local economy and more local jobs. The future development of the Whenuapai area is a key project for the City in relation to this objective.

The Whenuapai Airbase represents a substantial physical resource in a strategic location. Because of the combination of its existing and historical use and the current infrastructure, it would be difficult, if not impossible to replicate this resource elsewhere in the Auckland region. The Proposed Plan Change sets the framework to protect this important resource and its future potential.

The City has a clear policy position on Whenuapai which it has been pursuing for a number of years. While Waitakere City has no control over any decision by the Crown to pursue joint use of the Airbase, or how it decides to dispose of the land under the options available to it (i.e. Airport Authorities Act or Public Works Act) the Council is responsible for the management of the natural and physical resources within its boundaries. Specifically, the Council can decide to initiate a District Plan Change process to re-identify the land in order to protect its potential as an airport.

Following Resolution 1553/2005, the Proposed Plan Change has been prepared as part of an on-going process to secure the future use of the Airbase for commercial airport activities. This process has been occurring since 2002. Given the length of time required to complete statutory processes under the Resource Management Act 1991, the Council has chosen to initiate those processes now, so that they will be completed by 2014 at the latest. The New Zealand Defence Force currently indicates that 2014 will be when the transferral of the Air Force from Whenuapai will occur. To commence this process in 2014 would mean that the existing Airbase facilities could remain idle and derelict while the statutory processes under the Resource Management Act 1991 are completed.

### **ISSUES**

#### **Comments On The Draft Plan Change**

The Draft Plan Change was available for public comment from 29 May 2006 to 12 July 2006. A total of 612 comments were received, and these are summarised in Appendix 1 at pages a... to A.... Of the 612 comments received, 480 were made by completing a standard form available from

the Whenuapai Action Group (WAAG) web site.

Overall there were 80 unique comments made. Of these, 15 were supportive and 65 opposed the draft Plan Change.

The original consultation period was to end on 28 June 2006. Following requests from several people, the period for comment was extended to 12 July 2006. As at 28 June 2006, 269 comments had been received by Council. A further 343 comments were received during the period 29 June – 12 July 2006. A further 14 comments, including one from the Auckland Regional Council were received after this extended closing date.

Fourteen comments were received twice, via electronic mail and then via the postal system. Six comments were neutral, but sought an extension of time for comments on the draft Plan Change.

Overall, 94% of the total comments made opposed the draft Plan Change.

### **Discussion Of Comments Received**

#### **Comments in Support**

Comments in support expressed the following views:

- The Airbase is an existing facility, a valuable asset and a resource that should be used – negligent and short sighted for future generations to lose facility
- Mangere is a monopoly and it would give it some healthy competition
- Will help establish strong business growth for the Auckland Region - complementary to new Massey North and Hobsonville hubs and would attract new business
- Not sure what the future is so it should be protected as a possible future airport
- Too good an opportunity to pass up
- Joint defence/civilian use is feasible
- People have always known it was an airport
- Auckland needs a second airport and it is a badly needed asset for West Auckland
- People need to think about the big picture, need to create a balance between social and environmental and economic issues

#### **Comments in Opposition**

Many of the comments received from individuals were concerned with perceived adverse effects, such as noise arising from aircraft movements, traffic, and a drop in property values of surrounding land.

A number of the comments made related to issues that are outside the scope of the District Plan process under the Resource Management Act. These included the financial viability of the airport, the need for a second airport and the desire for the airbase to remain. These non-District Plan issues have already been dealt with in the lengthy consideration and debate that Council has been involved in since the Government announced in 2002 that Base Auckland would be closed and the RNZAF integrated at Ohakea. This debate has preceded this notification report and resulted in the Council resolution 1553/2005 referred to at the beginning of this report. A discussion of each of the non-District Plan issues is provided in Appendix 2 that is attached at Pages A.. to A..

Some issues such as the need for the airport and transportation congestion have been discussed in this report.

The following table summarises the main issues raised in the comments in opposition:

|   | Non District Plan Issues  | District Plan Issues  |
|---|---|---|
| 1 | <p><b>CENTRAL GOVERNMENT</b></p> <ul style="list-style-type: none"> <li>- Keep Airforce at Whenuapai</li> <li>- Use Whenuapai for Civil Defence purposes</li> <li>- Waitakere City Council work with Central Government and the Auckland Regional Council to find an alternative use</li> </ul>                   | <p><b>NOISE</b></p> <ul style="list-style-type: none"> <li>- Noise in homes / sleep disturbance</li> <li>- No restrictions on operating hours / engine testing hours</li> <li>- Effects on North Shore City - Waitakere City not seen by many to be concerned about this</li> <li>- Effects on schools (Whenuapai Primary, Pinehurst, Kristen, Albany Junior High, and others) and effects on children's ability to learn given the increased noise.</li> <li>- Frequency of aircraft movements</li> <li>- Existing airbase flight numbers have been overstated and are really as low as 5000 movements per year. Currently there are 6500 movements per annum</li> </ul> |
| 2 | <p><b>REGIONAL</b></p> <ul style="list-style-type: none"> <li>- Duplication of airport infrastructure and services (customs, border control etc) is unnecessary</li> <li>- Mis-diagnosis of problem - transport congestion in Auckland Region is the problem - fix that rather than duplicate airports</li> </ul> | <p><b>ENVIRONMENTAL EFFECTS</b></p> <ul style="list-style-type: none"> <li>- Airport out of character with existing residential development</li> <li>- Visual effects of terminal buildings</li> <li>- Impact on coastal margins and how these are to be protected</li> </ul>   |
| 3 | <p><b>ECO-CITY ISSUES</b></p> <ul style="list-style-type: none"> <li>- Is the airport clean / green?</li> <li>- Does having an airport at Whenuapai airport align with Eco-City principles?</li> </ul>  | <p><b>TRAFFIC EFFECTS</b></p> <ul style="list-style-type: none"> <li>- Congestion as commuters travel from Mangere to Whenuapai and vice versa, and commuters from Waikato</li> <li>- Local traffic congestion</li> </ul>   |
| 4 | <p><b>FINANCIAL ISSUES</b></p> <ul style="list-style-type: none"> <li>- Concerns about financial costs and risk to Council</li> </ul>   | <p><b>DISTRICT PLAN</b></p> <ul style="list-style-type: none"> <li>- Alignment with Regional Growth Strategy / Regional Policy</li> </ul>   |

|   |  |   |
|---|--|---|
|   | <ul style="list-style-type: none"> <li>- Concerns about financial viability of airport</li> <li>- No need for a second airport, existing airport at Mangere can cope with anticipated air traffic</li> <li>- Whenuapai will be a "B Grade" airport</li> <li>- Large expenditure by Council amounts to lost opportunities for other development</li> <li>- Upgrade infrastructure (roads, drainage) in Whenuapai rather than spend it on airport</li> </ul> | <p>Statement</p> <ul style="list-style-type: none"> <li>- Specific comments on wording of Draft Plan Change</li> <li>- Plan change unclear as to what is provided for - lack of information to undertake a proper analysis of the effects</li> <li>- Definition of "airport activities"</li> <li>- Consultation on Draft Plan Change</li> <li>- "Why the rush"</li> </ul>   |
| 5 | <p><b>ECONOMIC ISSUES</b></p> <ul style="list-style-type: none"> <li>- No evidence that this is best use of ratepayer funds to achieve economic growth in Waitakere City</li> <li>- Comparisons to Hamilton Airport for identification of economic benefit</li> <li>- V8 motor sport - loss of this motor sport event costly to Waitakere City and Auckland Region</li> </ul>  | <p><b>PROCESS</b></p> <ul style="list-style-type: none"> <li>- No consideration of alternatives</li> <li>- No consultation with community on alternatives suggested (University, Cemetery, Residential, Industrial, Commercial )</li> <li>- Any decision to have an airport should be made at a regional level with the involvement of all Councils and not just the decision of Waitakere City Council</li> <li>- Concern that not enough information had been provided in the Draft Plan Change to allow for the effects arising from it to be properly assessed</li> </ul> |
| 6 | <p><b>SAFETY ISSUES</b></p> <ul style="list-style-type: none"> <li>- Jet fuel dumping on residential areas / tank water contamination / Upper Harbour water pollution</li> <li>- Aircraft accidents in residential areas</li> <li>- Fog in Whenuapai a regular event</li> </ul>  | <p><b>OTHER</b></p> <ul style="list-style-type: none"> <li>- Air and water pollution from jet fuel</li> <li>- Allow recreational activities as a "permitted activity"</li> <li>- Effects on property values</li> </ul>  |
| 7 | <p><b>GENERAL ISSUES</b></p> <ul style="list-style-type: none"> <li>- Effects on existing lifestyles</li> <li>- Effects on property values</li> <li>- Stress on people in the community from worrying about this issue</li> </ul>  |   |

## **District Plan Issues**

A discussion addressing each of the District Plan issues that were raised through the consultation process follows:

### **1. Noise**

A main issue raised in comments by those opposed to the airport was that of noise arising from aircraft movements. It is acknowledged that the operation of the airbase as a commercial airport has the potential to create adverse effects on adjacent residents and the surrounding community from aircraft noise. It is intended that noise arising from aircraft operations is managed through the use of the existing District Plan Whenuapai Airbase noise contours (which will be slightly decreased in size to reflect the results of new measurement techniques). The proposed Plan Change would include a requirement for a Comprehensive Development Plan (CDP) to be prepared. The CDP would require comprehensive noise management planning and monitoring to ensure that the activities at the airport meet the contour controls. The CDP would also include provision for an ongoing consultation process to be set up with the local community.

The figure of 20,000 aircraft movements, quoted in the section 32 analysis released with the draft Plan Change, was derived from the figures supplied in the appendices to the report by the Joint Officials Group in 2004. However more recent figures suggest that the number of current aircraft movements may be somewhat lower. However, as discussed, the existing noise contours will not change substantially. Any aircraft movements generated by a commercial airport or a joint defence/commercial use airport will need to meet the noise levels sets out in those contours. The contours are based on 24 hour averaging of noise generated by aircraft. They allow for different numbers of movements based on the type and size of aircraft i.e. large aircraft will be more restricted in the number of movements in order to stay within the noise levels than smaller aircraft. Movements at night will also ensure that the noise contours are more easily exceeded and may mean substantial restrictions on night flying. Despite this, it is understood that a commercial airport could operate viably within such restrictions.

### **2. Environmental Effects**

The airport has been in existence for over 70 years and as such is an established part of the landscape in Whenuapai. The landscape assessment within the section 32 report clearly shows that the airport and its components represent a unique landscape characteristic within the City. The Proposed Plan Change also includes landscaping and design requirements (within the Comprehensive Development Plan framework), that any further development including buildings within the Whenuapai Airport Special Area would need to meet.

Mechanisms to protect the coastal margins are already in place in the Waitakere City District Plan. The size of the Whenuapai Airport Special Area has also been reduced so that it no longer extends to the coast, but is bordered by Kauri Road to the east.

### **3. Traffic Effects**

Issues such as:

- congestion as commuters travel from Mangere to Whenuapai and vice versa;

- commuters from Waikato; and
- local traffic congestion

were raised in the comments.

The proposed Plan Change requires traffic management for both regional and local traffic (refer to the requirement for a 'Transport Audit'), through the Comprehensive Development Plan framework. Traffic modelling undertaken for the Council by David Young Traffic Consultants (attached to the section 32 Report) also shows a potential Net Positive Value to the regional road network of between \$230 and \$600 million, dependant on the number of passenger movements that will occur at Whenuapai. This is largely due to people and freight not having to travel through the Auckland Isthmus if the airbase was to be used as a commercial airport.

Waitakere City, North Shore City and Rodney District are seeking to reduce the amount of people that need to travel through the Auckland Isthmus to employment locations. Whenuapai Airport will provide a stimulus for the economies of the Northwest and will help achieve these goals.

#### **4. District Plan Matters**

##### **(a) Alignment with Regional Growth Strategy / Regional Policy Statement**

The section 32 Report discusses the way in which the proposed Plan Change aligns to the Regional Growth Strategy and Regional Policy Statement. The establishment of a commercial airport at Whenuapai was considered by the JOG Report 2004 to be consistent with the Regional Policy Statement

*“insofar as it continues the use of regionally significant infrastructure located outside the MUL, and provides for the protection and continued use of this infrastructure. Moreover the retention of an airport activity would reinforce the RGS (Regional Growth Strategy), by ensuring that the whole peninsula (approximately 1500 hectares) does not come under pressure for urban expansion.”*

##### **(b) Definition of “Airport Activities”**

The definition of “Airport Activities” has been revised to limit retailing and commercial activities to small convenience shops servicing air travel needs only and any other activities are limited to those related to aircraft using the airport (including maintenance). This should ensure that a quasi-aeronautical industry precinct cannot establish on the site.

Concerns were expressed by the Auckland Regional Council and IMF Westland that the Draft Plan Change did not sufficiently restrict the level of commercial and industrial activities that could establish at the airport as “ancillary activities”. This concern is acknowledged and a new policy (Policy 11.56) has been proposed to ensure that the integrity of the Auckland Regional Council Metropolitan Urban Limit is not undermined.

##### **(c) Consultation on Draft Plan Change**

Council has fulfilled its statutory duty under Clause 3 of the First Schedule of the Resource Management Act 1991 by consulting with statutory agencies and the public on the Draft Plan

Change. Additional consultation is detailed in the section 32 Report. The Council responded to public comment and extended the consultation timeframe by two weeks, to enable people to have adequate time to comment on the Draft Plan Change. Comments and issues arising from this consultation are discussed in this report.

(d) "Why the rush"

The proposed Plan Change has been prepared as part of an on-going process to secure the future use of the Airbase for commercial airport activities. This process has been occurring since 2002. Given the length of time required to complete statutory processes of this nature under the Resource Management Act 1991, the Council has chosen to initiate the plan change processes now, so that they will be completed by 2014 at the latest. This is the date that the New Zealand Defence Force currently indicates that the transferral of the Air Force will occur. To commence this process in 2014 would mean that the existing Airbase facilities could remain idle and derelict while the statutory processes under the Resource Management Act 1991 are completed.

**5. Process Issues**

(a) No consideration of alternatives

The consideration of alternatives has already occurred, through the work of the Joint Officials Group. This Group reported to the Regional Growth Forum in June 2004 on alternatives for the use of the Whenuapai Airbase. Of the seven options considered, the Airport Option was considered to not be contrary to regional and district planning strategies, and had the potential to replace the economic loss to Waitakere City as a result of the departure of the military presence from Whenuapai Airbase. This report was endorsed by the Regional Growth Forum at a meeting on 24 June 2004

(b) No consultation with community on alternatives (University, Cemetery, Residential, Industrial, Commercial were suggested)

The work of the Joint Officials Group identified and considered seven options for the use of the airbase land. The consideration of those options and the conclusions reached has guided the Council.

**6. Other**

Effects on property values

The Whenuapai Airbase is an existing airport that has been in operation for over 60 years. People who have purchased properties in the area over that time have done so in full knowledge of the existence of the airport, and there is no evidence to suggest that the operation of the airport has had any significant impact on the prices paid for property in this vicinity. It is anticipated that the proposal will not adversely affect property values.

Air and Water Pollution from Dumping of Jet Fuel and from normal aircraft operations

Any commercial airport operating at Whenuapai must comply with the proposed Regional Air Land Water Plan regarding air pollution from all aircraft operations. In terms of fuel dumping, despite public perception, jet fuel dumping is not a common practice as it makes no economic sense to

dump expensive aviation fuel. Only a select few long haul types of aircraft have the capacity to dump fuel and it is only done in emergencies when it is necessary to land relatively soon after takeoff. Due to the quantity of fuel carried, the maximum take off weight of these aircraft exceeds their maximum landing weight and some fuel must therefore be jettisoned to ensure a safe landing in an emergency. Such dumping is always carried out at least 5000 feet above ground level to ensure that fuel has vaporised before it reaches the ground and it is carried out over water wherever possible.

In terms of air pollution from normal aircraft operations, commercial jet aircraft are also substantially cleaner than current military aircraft.

Not enough information provided for a proper assessment of the effects to be made.

It is acknowledged that the noise, traffic and landscaping reports had not been finalised at the time of the draft Plan Change. However regardless of the lack of these reports it is not intended that the proposed Plan Change have all these details finalised. The proposed Plan Change is intended to protect a strategic unique resource that it would be difficult if not impossible to replicate elsewhere in the Auckland Region. It is intended that the details relating to the operation of an actual airport would be presented in the application for a Comprehensive Development Plan which would be a notified application.

The proposed Plan Change recognises that a commercial airport can only proceed if economic circumstances permit, and all Civil Aviation permits are obtained. However the specialist reports provided as part of the section 32 Analysis have demonstrated that a viable commercial airport would be able to operate at Whenuapai.

Concern for the viability of a second airport and need for a second airport

The financial viability of the airport is a matter to be addressed by any private sector investor seeking to establish operations. Council is advised by Infratil (who own and operate a number of airports internationally) that there is a commercial opportunity and potential available at Whenuapai. Council is not intending to contribute to operating costs so therefore has no exposure to risk. The proposed Plan Change recognises that a commercial airport can only proceed if economic circumstances allow and other civil aviation approvals are obtained. If it is not viable and airport activities cease, then the proposed Plan Change provides a default position that enables District Plan Countryside Environment activities to proceed.

In terms of the "need" for an airport, there is no statutory or resource management requirement to demonstrate a need for a proposed activity. Under section 32 of the Resource Management Act, Council must demonstrate that the special area zoning is the most appropriate zoning for the land and the proposed provisions are the most appropriate provisions for achieving the sustainable management of natural and physical resources. This has been elaborated on within the section 32 report accompanying this report.

The proposed Plan Change is not about a need for a second Auckland Airport but is focused on protecting an existing resource, in this case an existing piece of infrastructure. The opportunity cost of not using or destroying Auckland's second and functioning airport is significant. The cost and difficulty of creating a second airport for Auckland in the future would be significant.

Allow Recreational Activities as a Permitted Activity

The Whenuapai Golf and Recreational Club Incorporated is located within the proposed Whenuapai Airport Special Area. It has requested that provision be made for the continued use of the Golf Club in the proposed Plan Change. However it is considered unnecessary to do so. The Club may have existing use rights under the Resource Management Act to continue to function, but whether or not it could stay would be dependent on negotiations with the new operator/owner of the airport and any requirements of the Civil Aviation Authority.

#### **Comments from Groups/Organisations/Companies**

##### **Massey Community Board, Waitakere City Council**

Comment was received from **Massey Community Board** (Comment 22/462) supporting the draft Plan Change but not supporting a commercial airport. The Community Board highlighted the need for expert advice, protecting the existing uses on the Airbase, the effects of noise and further consideration of alternative uses. A copy of this comment is attached at pages A... to A...

##### **Auckland Territorial Local Authorities and Auckland Regional Council**

**Auckland Regional Council** (Comment 22/619) provided a late comment. The future use of the Whenuapai Airbase is considered regionally significant by the ARC. Issues identified in relation to the draft Plan Change were as follows:

- Concern that a further report by the Joint Officials Group had not been provided,
- Concern that the objectives and policies were not sufficiently clear enough to guide decision makers
- Need more clarity that only ancillary activities to an airport are allowed and there is no pressure for general industrial and commercial zones to establish outside the Metropolitan Urban Limits
- Need mechanisms to protect coastal margins
- No provision for a Transport Audit as required by Change 6 to the Regional Policy Statement
- Integrated Catchment Management Plans have not been completed for the catchments in which the airport is situated.

**Auckland City Council** (Comment 22/397) did not express a view either way about the Airport, however it did suggest that a decision about an airport should be one taken regionally rather than by Waitakere City Council on its own. Auckland City also raised transport issues and uncertainty and lack of information about the scale of activities at the airport. A copy of this comment is attached at pages A... to A...

**Manukau City Council** (Comment 22/404) officers expressed the view that there is no need for a second airport in the Region, and indicated that further analysis on regional benefits needs to occur. Officers considered that the draft Plan Change is premature, and suggested that other activities on the Whenuapai Airbase site may be of greater benefit to the Region. Clarification of several matters within the draft Plan Change such as the continued or joint use of the airbase by Defence, anticipated noise levels and the scale and intensity of proposed activities were sought. It was also considered that the objectives and policies did not give clear guidance for the

assessment of a civilian airport. These matters have been addressed in this report and the Plan Change amended to address the issues. A copy of this comment is attached at pages A... to A...

**North Shore City Council** (Comment 22/547), via its Strategic Management Committee, resolved on 13 June 2006 to support the public notification of the proposed Plan Change, to allow the residents of both Waitakere and North Shore Cities to be involved in the Resource Management Act's statutory process for this proposed Plan Change. A copy of this comment is attached at pages A... to A...

**Rodney District Council** (Comment 22/611) expressed its support for the Whenuapai Airport, and commented that the use of a Special Area approach is appropriate. It also suggested specific amendments to the text of the draft Plan Change, and these have been addressed in the proposed Plan Change. A copy of this comment is attached at pages A... to A...

#### **Other Auckland Agencies**

Comment was received from the **Auckland Regional Transport Authority** (ARTA), (Comment 22/293) stating that they could make no comment as they considered that there was insufficient information available to enable them to do so. ARTA sought a copy of the section 32 report and a Transport Audit. A copy of this comment is attached at pages A... to A...

**Albany Junior High School** (Comment 22/218) provided a comment in opposition to the draft Plan Change. A copy of this comment is attached at pages A... to A...

**The West Auckland Green Party** (Comment 22/316) provided a comment in opposition to the draft Plan Change. A copy of this comment is attached at pages A... to A...

#### **Aviation Related Organisations**

Comment was received from **Air New Zealand Limited** (Comment 22/398), and its view that it would not use Whenuapai Airport as a regional airport has not changed. It recommends using the land for residential or light industrial uses. It also notes the cost of bringing the existing infrastructure and facilities up to the appropriate aviation standards, and the effects on Māngere Airport in terms of competition. A copy of this comment is attached at pages A... to A...

Comment was received from **Auckland International Airport Limited**, (Comment 22/333) addressing a perceived lack of regional assessment of the Airport, the perceived absence of need for the Airport, the perceived lack of benefits to Waitakere City, and challenges to the Council's draft section 32 Report. A copy of this comment is attached at pages A... to A...

Comments were received from the **Board of Airline Representatives New Zealand** (Comment 22/511 and 22/399) in which they consider that the planning work is premature and that the location of an airport must be handled at the regional and strategic level. While the Board is not opposed to planning for the development of Whenuapai as a commercial airport at the right time, it considers that the commercial viability of the airport should be established prior to the planning framework being placed in the District Plan. It also raises issues around traffic being accommodated within the noise contours and the possibility of cross town trips by travellers from Whenuapai to Māngere. A copy of this comment is attached at pages A... to A...

### Non-Governmental Groups

Comment was received from the **Whenuapai Golf and Recreational Club** (Comment 22/348) Incorporated, and while it was neutral about the draft Plan Change, it sought the protection of existing recreational facilities on the Airbase. A copy of this comment is attached at pages A... to A...

The **Whenuapai Airport Action Group** (Comment WAAG) (22/340) provided one official comment in opposition to the draft Plan Change. A copy of this comment is attached at pages A... to A...

**Whenuapai Ratepayers and Residents Association** (Comment 22/310) provided one official comment in opposition to the draft Plan Change. A copy of this comment is attached at pages A... to A...

**Greenhithe Residents, Ratepayers and Community Hall Association** (Comment 22/15) provided one official comment in opposition to the draft Plan Change. A copy of this comment is attached at pages A... to A...

**Massey and Birdwood Settlers Association** (Comment 22/460) provided one official comment in support of the draft Plan Change. A copy of this comment is attached at pages A... to A...

### Standard Comments

The Whenuapai Airport Action Group (WAAG) placed a standard comment form (attached at pages A... to A) on its website, and 480 completed comment forms were received. 471 of those comments opposed the draft Plan Change. It appears that the original format and content of the form was amended at some time during the commentary period. A copy of this amended form is attached at pages A... to A... When the answer to the fundamental question about whether the commentator supported the proposal was "no", the consequential options chosen by the commentator reflected that view. The issues identified within this form were:

- noise;
- frequency of aircraft movements (which results in noise);
- that travel to the Mangere Airport was acceptable; and
- an expectation that the completion of the Western Ring Route and a branch rail line to Mangere Airport would reduce travel time.

The document also disputes the expected economic growth that would be derived from the operation of the Whenuapai Airport. A final statement seeks that the Council put people before profits and ecology before economic growth. Many commentators who filled in the WAAG form also chose to add their own views in the space provided. WAAG also provided one comment as its unique comment, generally opposing the draft Plan Change.

Two other standard comment forms were received, of unknown origin. They appear to be written by an individual, and then copied and signed by others. Copies of these two forms are available at pages A... to A... . Thirteen copies of these two forms were received (7 of one, and 6 of the other). This form states that:

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- a second airport in the Auckland Region is not needed;
- disputes whether a second airport in the Auckland Region would improve traffic congestion;
- the roading required to service the new airport is deficient;
- that a branch rail line to Mangere Airport is referred to as a measure to assist reaching Mangere Airport;
- duplication of airport facilities is inefficient;
- disputes the number of aircraft movements;
- states that most of the environmental effects will fall on Auckland and North Shore Cities; and
- raises funding issues associated with building the airport and the related infrastructure.

#### **Other Comments**

##### **IMF Westland NZ Ltd (Comment 22/555)**

IMF Westland NZ Ltd had a concern with the definition of “*Airport Activities*” in that it was considered to be too broad and could enable the development of a pseudo-retail zone. This has been addressed in the proposed Plan Change through the introduction of a new policy and by referring to specific retail services. A copy of this comment is attached at pages XX to XX

#### **District Plan Policy Framework And Rules**

The District Plan has a well established policy and rule framework. The District Plan includes a number of Special Areas, which have been utilised to provide an appropriate planning framework for unique resources. Special Area Policies and Rules are site specific, in that they only apply to the defined special area as indicated on the District Plan Maps. As noted above the Whenuapai Airbase represents a significant, unique resource in a strategic location that once lost would be very hard to replicate in the City. It is therefore considered appropriate to utilise the existing Special Area Policy and Rule framework of the District Plan to enable the future use of the Airbase as an airport.

#### **Proposed Amendments To The Proposed Plan Change Arising From Issues Identified In The Comments**

As a result of the issues raised in the comments received, the following changes have been made to the proposed Plan Change;

- Additions to existing noise policies to ensure that Whenuapai Airport Special Area is referred to as well as the Airbase – Policies 10.15, 10.24 and 10.25;
- Addition of new policies and explanation text relating to the continued use of the Airbase by NZ Defence Force and provision for the airbase land to be used as a commercial airport either jointly with the NZ Defence Force or on its own, restrictions on retail and ancillary activities in the special area, the Comprehensive Development Plan framework, amenity, traffic and noise – Policies 11.17(d), 11.52, 11.53, 11.54, 11.56, .11.57, and 11.58;
- Amendments to the definition of “*airport activities*” to use existing District Plan terminology and to tighten the controls on ancillary activities such as retailing and other industrial activities; and

- Recognition of the landscape qualities of the existing airbase/airport.

### **The Proposed Plan Change**

The proposed Plan Change is attached at Pages A...to A. The proposed Plan Change (which incorporates the above amendments) includes:

- Addition of a reference to Whenuapai Airport Special Area in Objective 11;
- Seven new policies and explanations to support the new Special Area;
- a new Special Area Rule - Rule 29, Whenuapai Airport Special Area;  
This rule enables the development of airport facilities within the Special Area as a Discretionary Activity. This Rule includes the requirement for the approval by the Council of a Comprehensive Development Plan for the whole Special Area;
- A new definition – “*Airport Activities*”;
- an amendment to the District Plan Maps to identify the Special Area which at the request of the Ministry of Defence has been slightly reduced in size;
- an amendment to the District Plan Noise Map to slightly decrease in size the existing noise contours to take into account new measuring techniques; and
- consequential amendments throughout the District Plan.

The proposed changes are summarised below:

### **Policy Section**

- Recognition of the landscape elements of the airport in Part 3, the City's Environment
- Addition of the Whenuapai Airport Special Area in Part 3
- The addition of a new bullet point to Objective 11 which specifically refers to the Whenuapai Airport Special Area

Objective 11 is “*concerned with protecting those aspects of the environment that are particularly valued by the community and recognising the varying character of each part of the City*”. This Objective also “*recognises the importance of maintaining and enhancing the particular elements and characteristics that define the various landscapes, local areas and neighbourhoods of the City*”. It is considered appropriate that reference to the Airport Special Area which is a unique and substantial physical resource in a strategic location, should be specifically added to this Objective.

- The addition of seven new Policies and Explanation of those Policies

New Policies 11.52, 11.53, 11.54, 11.55, 11.56, 11.57 and 11.58 and related explanation refer to the Comprehensive Development Plan framework of the Whenuapai Airport Special Area Rules, the continued and joint use of the airbase by Defence, ensuring that the integrity of the Auckland Metropolitan Urban Limits is not undermined by inappropriate commercial and industrial activities, and efficient access and storage of hazardous substances at the Airport.

- Consequential and additional changes within the Policy Section to four existing Policies (Policies 10.15, 10.24, 10.25 and 11.17(d)) to recognise the implications of the Whenuapai Airport Special Area in relation to noise, other emissions and the retail hierarchy in the City

### Rules Section

- The addition of a new Special Area Rule 29, entitled the Whenuapai Airport Special Area. This enables the development of airport facilities within the Special Area as a Discretionary Activity. This Rule includes the requirement for the approval by the Council of a Comprehensive Development Plan for the whole Special Area
- The addition of a definition of "Airport Activities"
- Consequential changes within the Rules Section

### Maps Section

- Amendment of the existing District Plan Maps to identify the Whenuapai Airport Special Area
- Amendment of the District Plan Map Appendix III RNZAF Base Auckland Noise Control Area, to include a revised noise Ldn65 contour for the airport.

### Statutory Considerations And Section 32 Analysis

The purpose of a district plan, as outlined in section 72 of the Resource Management Act, is to assist Council to carry out its functions. Councils' functions are outlined in Section 31 as the control of actual and potential effects of the use, development or protection of land and associated natural and physical resources in order to achieve the purpose of the Act. Council is to establish, implement and review the objectives, policies and methods to achieve this and can also include rules, which prohibit, regulate or allow activities.

Section 5 describes the purpose of the Resource Management Act:

*"The purpose of this Act is to promote the sustainable management of natural and physical resources.*

- (2) *In this Act, "sustainable management" means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well being and for their health and safety while -*
- (a) *Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
  - (b) *Safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
  - (c) *Avoiding, remedying, or mitigating any adverse effects of activities on the environment."*

Environment is defined in Section 2 of the Act as follows:

*"Environment" includes -*

- (a) *Ecosystems and their constituent parts, including people and communities; and*
- (b) *All natural and physical resources; and*
- (c) *Amenity values; and*
- (d) *The social, economic, aesthetic, and cultural conditions which affect the matters stated in paragraphs (a) to (c) of this definition or which are affected by those matters."*

Section 74(1) of the Act is the statutory basis on which Council undertakes changes to its Plan.

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Section 74(1) states that:

“A territorial authority shall prepare and change its district plan in accordance with its functions under section 31, the provisions of Part II, its duty under section 32, and any regulations.”

Section 32 of the Act requires a rigorous test to ensure that before any objective, policy, rule or other method is adopted, a local authority has had regard to

- “(3) *An evaluation must examine –*
- (a) the extent to which each objective is the most appropriate way to achieve the purpose of this Act; and*
  - (b) whether, having regard to their efficiency and effectiveness, the policies, rules, or other methods are the most appropriate for achieving the objectives.*
- (3A) The subsection applies to a rule that imposes a greater prohibition on an activity to which a national environmental standard applies than any prohibition or restriction in the standard. The evaluation of such a rule must examine whether the prohibition or restriction it imposes is justified in the circumstance of the region or the district.*
- (4) For the purposes of the examinations referred to in 3 and 3A, an evaluation must take into account –*
- (a) the benefits and costs of policies, rules, or other methods; and*
  - (b) the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods.*
- (5) The person required to carry out an evaluation under subsection (1) must prepare a report summarising the evaluation and giving reasons for that evaluation.*
- (6) The report must be available for public inspection at the same time as the document to which the report relates is publicly notified or the regulation is made.”*

A section 32 analysis for the proposed Plan Change has been prepared and will be provided at the Council meeting. The Resource Management Act 1991 requires, via section 32(6), that the section 32 report is made available at the time of public notification of the proposed Plan Change.

## RESOURCES

All specialist studies required for this proposed Plan Change have been completed and the resources required to progress the proposed Plan Change are available in existing budgets. Progressing the proposed Plan Change through the statutory process once it is publicly notified can be adequately resourced from existing budgets.

## CONCLUSION

The purpose of this report is to present to the Council the analysis of the comments received on the draft Plan Change and seek approval to publicly notify the Proposed Plan Change to establish an Airport Special Area at Whenuapai. The proposed Plan Change outlines the amendments to the Policy, Rules and Maps Sections of the District Plan that are required to enable the development of an airport at the existing Whenuapai Airbase.

An important part of processing a proposed Plan Change is enabling enough time for interested parties to prepare their submissions. In light of the comments received on the draft Plan Change, it is considered appropriate to double the period of time available for submissions from the statutory minimum of 20 working days to 40 working days. This ability is provided to the Council via section 37(1)(a) of the Resource Management Act 1991.

This report seeks approval from the Council to publicly notify Proposed Plan Change 22, as attached at pages xx to XX.

### **RECOMMENDATIONS**

1. That the Proposed District Plan Change 22: Whenuapai Airport Special Area report be received.
2. That pursuant to the First Schedule to the Resource Management Act 1991, the Council resolve to publicly notify proposed Plan Change 22 relating to the Whenuapai Airport Special Area as set out in Pages A... to A...
3. That the statutory period for public submissions for proposed Plan Change 22, Whenuapai Airport Special Area, be 40 working days from the date it is notified.

Report prepared by Philip Brown, Group Manager: Planning & Community Services

**APPENDIX 1 DRAFT PLAN CHANGE 22 SUMMARY OF COMMENTS RECEIVED**

|                                       | Details   | Number | Support | Neutral /<br>No Comment | Oppose |
|---------------------------------------|---|--------|---------|-------------------------|--------|
| <b>Territorial Local Authorities</b>  | Waitakere City Council<br>Massey Community Board                | 1      |         | Neutral                 |        |
|                                       | Auckland City Council   | 1      |         | Neutral                 |        |
|                                       | Manukau City Council  | 1      |         |                         | Oppose |
|                                       | North Shore City Council  | 1      |         | Neutral                 |        |
|                                       | Rodney District Council   | 1      | Support |                         |        |
| <b>Iwi</b>                            | Ngati Whatua  |        |         | Neutral                 |        |
|                                       | Te Kawerau a Maki   | 1      | Support |                         |        |
| <b>Other Auckland Agencies</b>        | Auckland Regional Transport Authority (ARTA)                    | 1      |         | No Comment              |        |
|                                       | Albany Junior High School                                       | 1      |         |                         | Oppose |
|                                       | West Auckland Branch Green Party Aotearoa                       | 1      |         |                         | Oppose |
| <b>Aviation Related Organisations</b> | Air New Zealand Limited   | 1      |         |                         | Oppose |
|                                       | Auckland International Airport Limited                          | 1      |         |                         | Oppose |
|                                       | Board of Airline Representatives New Zealand (Incorporated)     | 1      |         | Neutral                 |        |
| <b>Non-Governmental Groups</b>        | Whenuapai Airport Action Group (WAAG) (official submission)     | 1      |         |                         | Oppose |
|                                       | Whenuapai Ratepayers and Residents Association                  | 1      |         |                         | Oppose |
|                                       | Greenhithe Residents, Ratepayers and Community Hall Association | 1      |         |                         | Oppose |
|                                       | Massey and Birdwood Settlers Association                        | 1      | Support |                         |        |
|                                       | Whenuapai Golf and Recreational Club Incorporated               | 1      |         | Neutral                 |        |
| <b>Individuals</b>                    | Unique Comments   | 80     | 15      |                         | 65     |
|                                       | WAAG Standard Form  | 480    | 9       |                         | 471    |
|                                       | Other Pro-forma Form 1  | 7      |         |                         | 7      |
|                                       | Other Pro-forma Form 2  | 6      |         |                         | 6      |
|                                       | IMF Westland  | 1      |         |                         | Oppose |

**AGENDA REPORT**

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|                           |                     |            |           |          |                  |
|---------------------------|---------------------|------------|-----------|----------|------------------|
|                           |                     |            |           |          | specific matters |
| <b>Extension Requests</b> | 6 Unique            | 6          |           | Neutral  |                  |
| <b>Duplicate Comments</b> | Via e-mail and Post | 14         | N/A       | N/A      | N/A              |
| <b>Totals</b>             |                     | <b>612</b> | <b>27</b> | <b>8</b> | <b>557</b>       |

This Table does not include the late submissions received.

## APPENDIX 2 - DISCUSSION OF COMMENTS RECEIVED

### DISCUSSION OF NON-DISTRICT PLAN ISSUES

#### 1. Central Government Issues and Comments

##### (a) Keep Air Force at Whenuapai

Although the Council continues to support the retention of the military presence at Whenuapai Airbase, this decision is out of Council's control. The government has indicated that the Base will be closed and the Airforce moved to Ohakea somewhere between 2010 and 2014. The development of a commercial airport is an endeavour to mitigate the economic impact of the relocation of Air Force staff out of Waitakere City.

##### (b) Use Whenuapai for Civil Defence purposes

The Council would support this function remaining, but does not see that this would prevent the development of a commercial airport. Civil defence and emergency use is provided for within the Proposed Plan Change.

##### (c) Waitakere City Council work with Central Government and the Auckland Regional Council to find an alternative use

This process has already occurred, through the work of the Joint Officials Group. The Joint Officials Group, comprising of staff from all the Councils of the Region including the Auckland Regional Council, was established at the direction of the Auckland Regional Growth Forum to examine the issue of the future use of Whenuapai Airbase. This Group reported to the Regional Growth Forum in June 2004 on alternatives for the use of the Whenuapai Airbase. Of the seven options considered, the Airport option was considered to not be contrary to regional and district planning strategies and has the potential to replace the economic loss to Waitakere City as a result of the departure of the military presence from Whenuapai airbase

The following is taken from the executive summary of that report:

*“Seven options for the future use of the land have been addressed in this report. They include Urban Development, Countryside Living, Open Space, Public Work, Airport and Ancillary Activities, Airport and Urban Development and Land Banking.*

*With regard to the Public Work option, no ‘public work’, other than the Airport options, have been put forward by any central, regional or local government agency or any other designating authority.*

*With regard to Land banking, neither central, regional nor local government has the ability through existing legal disposal processes to obtain the land for such a purpose, as land banking is not a public work. If this option was possible, it would not replace, in the short term at least, the economic loss to Waitakere City and to a lesser extent the north-western sector, of the NZDF departing from Whenuapai, particularly when this is compared to the urban development and*

*airport options.*

*Along with the Land Banking option, the Open Space option would be unlikely to replace the economic loss to Waitakere City, particularly if it was for passive public open space. Private 'open space' could generate some economic activity within Waitakere City. In addition, much of this land is not considered particularly desirable or appropriate for passive public open space as it is compromised by the existing airport infrastructure and the likely cost to remediate the site for open space purposes.*

*The Countryside Living option, whilst having more of an economic benefit than the three previous options, through having additional local residents, is not considered to adequately substitute the loss of the NZDF from Whenuapai. Furthermore, due to the existence of a large number of existing titles, the development of the land for countryside living, should the lots be purchased by former landowners/successors, would be of concern. This is because it would be contrary to the strategic direction of the region effectively resulting in an uncontrolled subdivision of land. It would also be difficult for Waitakere City to impose financial contributions for the required upgrade of infrastructure such as roading.*

*The Urban Development option and the Airport and Urban Development option are contrary to the strategic direction of the Region's and Waitakere's strategic growth management objectives, potentially undermining the RGS. These two options have the potential to replace the economic loss of the NZDF concluding operations at Whenuapai, however, it is considered that this would occur at the cost to the integrated and land use strategies as expressed in the RGS.*

*The Airport option with Ancillary Activities, as per the Land Banking, Open Space, and potentially the Countryside Living and Public Work options, is not considered contrary to the regional and district strategic planning strategies, including the RPS, RGS and the District Plan. Regionally significant infrastructure is 'deemed' to be appropriate outside of the MUL and is defined to include airports and flight paths. Furthermore, in terms of this option the retention of an airport would likely have the effect of reinforcing the RGS and therefore discouraging the whole Peninsula (approximately 1500 hectares) from urban expansion pressures.*

*This option also has the potential to replace the economic loss to Waitakere City as a result of the NZDF departing from Whenuapai, as do the Urban Development and Airport and Urban Development options, however has the benefit which these options don't in that as stated is permitted outside of the MUL and reinforces the Strategic Direction of the region. In addition, a commercial airport at Whenuapai could potentially be beneficial to the development of business in the north western sector.*

*This Airport option with Ancillary Activities can be expected to generate adverse environmental impacts, in particular noise effects. These would need to be fully assessed through the Resource Management Act statutory processes and potentially measured against the existing operation and activities allowed under the existing defence designation. The RMA process would be a public process and should be fully integrated in terms of all plan changes, designations and consents required, be jointly notified, assessed and heard.*

*The opportunity cost is a critical issue that the region must address. The Airbase may represent the only practical opportunity of retaining the option for Auckland to have a second commercial*

*airport, in that with the existence of the NZDF at Whenuapai, this means that there is potentially an already established use and effects boundary. The Airbase represents a significant piece of regional infrastructure that is strategically situated to service the Auckland region. All other options put forward could occur elsewhere in the region. It is questionable whether this is the case with an airport, due to the cost of establishing the required infrastructure, the difficulty in obtaining an appropriate site and the difficulty in obtaining planning approval from a zero or minimal effects base."*

These findings were endorsed by the Auckland Regional Growth Forum by resolutions dated 23 June 2004.

## 2. Regional Issues and Comments

(a) Decision to have an airport at Whenuapai should be made at a regional level and not just by WCC

There has been a regional process which concluded that the best future use of Whenuapai is as a commercial airport. As discussed above this has occurred through the Joint Officials Group which reported to and was endorsed by the Regional Growth Forum in June 2004.

In addition to this, should the airbase be closed, it is Waitakere City's prerogative to seek to acquire the airport for commercial use under the functions and powers conferred upon it by the Local Government Act and the Public Works Act.

(b) Duplication of airport infrastructure and services (customs, border control etc) is unnecessary

This is not a question of the duplication of infrastructure as Whenuapai is already an airport. It is an issue about not wasting resources and using existing infrastructure for the generation of economic benefits to the economies of Waitakere City, North Shore City and Rodney District.

Existing Government policies on border control etcetera provide a process to establish this at Whenuapai for commercial uses. The Military already call on these services for their operations.

(c) Mis-diagnosis of problem - transport congestion in Auckland Region is the problem - fix that rather than duplicate airports

500,000 people live within 16 kilometres of Whenuapai Airbase. Using the airbase as a commercial airport would provide a more convenient location for those people should they wish to utilise air transport or air freight. Traffic modelling undertaken for the Council by David Young Traffic Consultants show a potential Net Positive Value (NPV) to the regional roading network of between \$230 and \$600 million, dependant on the number of passenger movements that will occur at Whenuapai. This is largely due to people and freight not having to travel through the Auckland Isthmus if the airbase was to be used as a commercial airport.

Waitakere City, North Shore City and Rodney District are seeking to reduce the amount of people that need to travel through the Isthmus to employment locations. Whenuapai Airport will provide a stimulus for the economies of the Northwest and will help achieve these goals. The use of Whenuapai for commercial aircraft operations aligns with the Strategic Objectives and planning of

the north western Councils.

### 3. **Eco-City Issues**

#### (a) Is the airport clean / green? Align with Eco City Principles?

Use of the Airbase as a commercial airport aligns with Eco City principles as it reuses an existing piece of infrastructure and a substantial physical resource in a strategic location and as such will provide for the sustainable development of the economy. "Eco City" is not just about trees and rivers. It is also about providing local employment opportunities to reduce the need to travel, and creating a strong and dynamic local economy.

The development of a commercial airport at Whenuapai will complement the development of the economies in Rodney District, North Shore City and Waitakere. It will complement the Housing New Zealand planned development at Hobsonville, through supporting local job creation. It will also complement the planned significant commercial and industrial centres within the areas of Waitakere already identified for urban growth. Redeveloping the airport land for other purposes will make it extremely difficult for the Auckland Region to ever develop a second airport given the near impossibility of acquiring sufficient land in an appropriate area and obtaining the necessary consents for a new airport.

The success of modern economies relates directly to the degree that the economy connects to the outside world via networks. Networks need to be viewed in "multiple ways"; physically, socially, locally, regionally, globally, between knowledge and creative business, and virtually, through telecommunication technologies. An airport provides another level of connection. A commercial airport is an important piece of infrastructure that will supplement and support the fragile economy of Waitakere City and make it more robust.

The Whenuapai area is well connected with other regional business centres and in particular connects the "creative trades" workforce of the Waitakere area, the "high-tech" industries of North Shore City, and the agrarian export sector of Rodney District. The Whenuapai site provides an opportunity to specifically design, develop and integrate an economic hub, and a gateway into nearby business areas. Over time industrial and commercial activities ancillary to the airport activity can be developed, but only if a commercial airport is given the opportunity to develop.

A commercial airport would help attract and develop targeted clusters of businesses in Waitakere City, North Shore and Rodney District. A commercial airport would assist with this process – it would help raise the profile of the area by giving it an international address, which will make it attractive to businesses with an export focus. It will also facilitate trade exports within the Australia / Pacific region by introducing competition into the airport market. It may also assist with the attraction of foreign direct investment.

Whenuapai Airport and related developments will create major employment opportunities and generate financial benefits. There is significant global evidence that airports generate jobs and encourage the nearby location of industries that benefit from close proximity to such ports. It is relatively simple to switch from the present military airfield to a civilian one. All of the other options advanced are likely to cost more than developing the airfield, could be located elsewhere, will not deliver comparable benefits, or cannot be readily and certainly achieved due to the complex

disposal procedures required for the land to be used for anything other than an airport. Importantly, only the commercial airport option has the ability to directly and quickly mitigate the impacts of Defence's withdrawal from the City.

#### 4. Financial issues

(a) Concerns about financial costs and risk to Council

The project is structured so that costs and risk will fall to the private sector.

(b) Concerns about financial viability of airport

This is a matter to be addressed by any private sector investor seeking to establish operations. We are advised by Infratil, who own and operate airports all over the world that there is a commercial opportunity and potential available at Whenuapai. Council will not be contributing to operating costs so therefore has no exposure to risk.

(c) Existing airport at Mangere is all that is needed

This is not a matter of need but a matter of using an existing piece of infrastructure. The opportunity cost of not using or destroying Auckland's second and functioning airport is significant. The cost and difficulty of creating a second airport for Auckland in the future would be significant.

(d) Whenuapai will be a "B Grade" airport

Whenuapai Airport will not be as large or extensive as Mangere Airport. However size is not the determinant of the quality of a place or an area. The Proposed Plan Change includes design requirements that will need to be met within the Comprehensive Development Plan framework. The runway and land area at Whenuapai is bigger than Wellington Airport.

(e) Upgrade infrastructure (roads, drainage) in Whenuapai rather than spend it on airport

The provision of an airport will provide the economic generator that will assist the Council to upgrade existing roading and infrastructure in the Whenuapai area. It is likely that if the commercial airport was not pursued, other options such as rural lifestyle development could impose a considerable cost to the council and ratepayers as they would not add significantly to Council's rating base.

(f) Large expenditure by Council amounts to lost opportunities for other development

Council has no intentions of funding the cost of owning and operating the airport.

#### 5. Economic Issues

(a) No evidence that this is best use of ratepayer funds to achieve economic growth in Waitakere City

Waitakere City will not use ratepayers' funds to establish the airport. Capital and costs for

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operations will be funded by the private sector.

In July 2002 Business and Economic Research Limited (BERL) undertook a study of the potential benefits of a rejuvenated Whenuapai Airport. The report found that the direct impacts of additional inbound overseas visitors to the region could generate up to 1,200 FTE's, with an additional 800 FTE's as a result of the airport operation itself. The report also identified the potential of Whenuapai to expand the infrastructure base of the north west sector of the Auckland Region providing new dimensions and a growth node for economic activity and development. Commercial operations at Whenuapai would provide a major stimulus to business service enterprises to locate in the "Northern Growth Zone" as well as a major boost to tourism, technical jobs, and logistics industries.

(b) Comparisons to Hamilton Airport for identification of economic benefit

The Economic Impact Assessment by BERL 2003 and BERL 2004 shows significant benefits to the city and the region. Whenuapai will primarily service that catchment of one million people north of the Auckland Isthmus. As the operating environment would be different to Hamilton, any comparison is not considered directly relevant. That said Hamilton Airport is a major economic activity generator for Hamilton, in the same vein as Whenuapai would be for the Auckland and in particular the Rodney, North Shore, Auckland City and Waitakere areas. In addition Whenuapai Airport already exists.

(c) V8 motor sport - loss of this motor sport event costly to Waitakere City and Auckland Region

We have not seen any proposal for this activity presented to Council. In any case it is considered that this would be a difficult activity to sustain at the existing airbase as it is doubtful that the Public Works Act would provide for the transfer of land for this activity. It is thought at this stage that the benefits to the Northern and Western sector from such an activity would be very small.

## 6. **Civil Aviation and Safety Issues**

(a) Jet fuel dumping on residential areas / tank water contamination / Upper Harbour water pollution

This is not correct and has no basis in fact. Despite public perception jet fuel dumping is not a common practice as it makes no economic sense to dump expensive aviation fuel. Only a select few long haul types of aircraft have the capacity to dump fuel and it is only done in emergencies when it is necessary to land relatively soon after takeoff. Due to the quantity of fuel carried the maximum take off weight of these aircraft exceeds their maximum landing weight and some fuel must therefore be jettisoned to ensure a safe landing in an emergency. Such dumping is always carried out at least 5000 feet above ground level to ensure that fuel has vaporised before it reaches the ground and it is carried out over water wherever possible.

(b) Aircraft accidents in residential areas

Aircraft safety standards are set by the Civil Aviation Authority, and all airlines using the airport will be required to abide by these. There would be no greater risk at Whenuapai than anywhere else in New Zealand or indeed the world. It is many times safer to travel by commercial aircraft than to

travel by private motor car. It is conceivable due to the reduced distances needed to travel by the residents of the north-west sector that traffic accidents, injuries and deaths would be reduced, therefore Whenuapai could have a net positive benefit in terms of improving safety for the travelling public.

(c) Fog in Whenuapai a regular event

The airport has been operating for many years. Fog is a potential issue for all airports and will occur from time to time. It is not a significant issue.

7. **General Issues**

(a) Effects on existing lifestyles

Whenuapai is an operational airbase and has been operating for many years. The anticipated noise effects are expected to be no greater than those arising from existing military operations. Property prices of houses located next to Wellington airport have increased significantly.

(b) Effects on property values

Overseas studies show conflicting reactions in property values to the establishment of an airport. Some studies argue that there is no difference in price for properties located close or far from an airport when the market is good. When the market is "soft" the main difference between such properties is the amount of time they take to sell. Other studies have revealed a decrease in values in the "announcement" period of the airport establishment and also lower values for properties within the higher noise contours. However further studies argue that as aircraft are becoming so much quieter that even the worlds busiest airports can be expanded without causing a drop in property values. While there is some expectation that property values may drop they may also increase significantly for many by virtue of the fact that they will be located close to the airport.

(c) Stress on people in the community from worrying about this issue

While the future of the airport remains uncertain this will continue to be an issue. However Council is committed to providing quality communication and consultation with all stakeholders. Council will ensure that all information is accessible and understandable so that the public can participate in the process in a meaningful way.

Prepared by Fraser Henderson, Manager, Strategic Projects