

New Plymouth District Council
[via email]

25 August 2020

Attention: District Plan Team

Further Submission by Papa Rererangi i Puketapu Ltd, New Plymouth District Plan Review

Papa Rererangi i Puketapu Ltd – New Plymouth Airport lodged a submission on the Proposed New Plymouth District Plan – Submitter Reference Number 504.

Please find attached a further submission on behalf of PRIP.

Please contact me if you wish to discuss the contents of this further submission in any capacity.

Yours sincerely



Hywel Edwards
Senior Associate - Planning
Branch Manager - New Plymouth

on behalf of

Beca Limited

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Copy

Richard Buttimore, Papa Rererangi i Puketapu Ltd, Operations Manager

**FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO, A
SUBMISSION ON NPDC'S NOTIFIED PROPOSED DISTRICT PLAN**

Clause 8 of Schedule 1 Resource Management Act 1991

To: New Plymouth District Council
Address: Private Bag 2025, New Plymouth 4342
Email: districtplan@npdc.govt.nz

Further Submitter Details

Name of further submitter: Papa Rererangi i Puketapu Ltd (New Plymouth Airport).....
Contact person: Richard Buttimore, Operations Manager.....
Postal address: 192 Airport Drive, New Plymouth Airport 4373
Email address for service: richard@npairport.co.nz.....
Phone number: 027 454 9198.....

I am: (please tick relevant box)

- a) A person representing a relevant aspect of the public interest.
(In this case, also specify the grounds for saying that you come within this category); or
- b) A person who has an interest in the proposal that is greater than the interest of the general public.
(In this case, also explain the grounds for saying that you come within this category); or
- c) The local authority for the relevant area.

Please state the grounds as to why you come within the category selected above:

Papa Rererangi i Puketapu Ltd (New Plymouth Airport) is regionally significant infrastructure, enabling the intra-regional movement of people and goods. It is the aviation hub for the Taranaki region, providing for the regional community's economic and social well-being.

Council Hearing (please tick relevant box)

Do you wish to be heard in support of your further submission? Yes No

If others make a similar submission would you consider presenting a joint case with them at a hearing? Yes No

Submission

The submission points, support or opposition, reasons and decisions sought are set out in the attached document.

Signed: 
On behalf of Papa Rererangi i Puketapu Ltd

Date 25 August 2020

Original Submitter	Part of the Submission			Reason for Support / Opposition	Relief Sought
	Sub No	Support / Oppose	Plan Provision		
Te Kotahitanga o Te Atiawa Trust	459.367	Support in part / Oppose in part	AIRPZ	<p>PRIP has worked constructively with mana whenua through the new terminal project. PRIP generally supports the submitters' opposition to the non-complying activity status of Māori Purpose Activities (refer PRIP's primary submission on AIRPZ-P5).</p> <p>PRIP notes the Airport Zone provisions apply alongside the Historic Heritage and Sites and Areas of Significance to Māori provisions, and looks forward to constructively working with mana whenua in this respect.</p>	Allow – provide for Māori Purpose Activities as a compatible activity / Discretionary Activity (PRIP notes there is currently a conflict in the rules - customary activities are permitted in PREC1-R2, but Māori purpose activities (which includes customary activities) are non-complying under PREC1-R13.
Puketapu Hapū - Fern Brand	589.33				
Mana Whenua Te Atiawa Iwi, Puketapu hapū- Grant Knuckey	512.1	Oppose	AIRPZ	<p>The Airport is regionally significant infrastructure. To give effect to higher order planning documents, airport activities and operations (including upgrades and development such as potential runway realignments) must be enabled in this respect.</p> <p>The identification of Sites and Areas of Significance to Māori and their associated spatial extents within the Airport Zone have been confirmed as part of the waahi tapu / District Plan review.</p>	Disallow
The Oil Companies	551.23	Support	Definitions / AIRPORT RETAIL AND COMMERCIAL ACTIVITIES	<p>The submitter has sought the following amendment to the definition. PRIP supports this amendment as it provides more clarity for airport retail and commercial activities:</p> <p>Fuel station: <i>Fuel installations and fuel servicing facilities.</i></p>	Allow
Marsden Machinery Limited	577.33	Support in part	Noise-O3	<p>The submitter seeks to amend O-3 to the extent that reverse sensitivity effects are 'avoided', as opposed to 'minimised'. The Airport is regionally significant infrastructure, and therefore PRIP supports the relief in principle so that its operation, as well as future upgrading and development, is protected. Consequential amendments would be required to P4 to achieve this objective (i.e. a direction to avoid reverse sensitivity as opposed to minimise) as well as a clear direction via activity status. (i.e. non-complying).</p>	Allow
KiwiRail Holdings Limited -	514.60	Support	Noise-O3	<p>The submitter seeks amendment to O3 to include additions to existing noise sensitive activities, as increased scale of noise-sensitive activities</p>	Allow

				will generate additional reverse sensitivity effects. PRIP agrees with this in a reverse sensitivity context.	
Papa Rererangi Puketapu Limited	504.31	N/a	NOISE-S1(7)	Point of minor clarification to confirm that noise from aircraft in flight is not regulated by the Plan nor RMA.	This provision requires a consequential / minor amendment to clarify the non-applicability of the provisions to aircraft in flight (as per the introductory text to the noise rules): The maximum noise generated from Aircraft Operations <i>on land</i> (excluding unscheduled Aircraft Engine Testing) at New Plymouth Airport over any 90 continuous days, measured in accordance with NZS 6805:1992 Airport Noise Management and Land Use Planning, shall not exceed
Kāinga Ora - Homes and Communities -	563.393	Oppose	NOISE-R5	The submitter opposes the rule applying noise sensitive activities in Residential and Rural Lifestyle zones, stating that internal noise levels can be managed through insulation requirements under the Building Act and Building Code, together with the maximum noise levels in NOISE-S1. PRIP opposes the submission due to the need to carefully manage reverse sensitivity effects in a holistic sense near the Airport.	Disallow
	563.392		NOISE-R6	The submitter opposes the rule applying noise sensitive activities in Residential and Rural Lifestyle zones, stating that internal noise levels can be managed through insulation requirements under the Building Act and Building Code, together with the maximum noise levels in NOISE-S1. PRIP opposes this due to the need to carefully manage reverse sensitivity effects in a holistic sense near the Airport.	Disallow
Don Crow	298.1	Oppose	DEV1 / Overview	The submitter supports the development of Stages 2 and 3 of the Bell Block Area Q Structure Plan Development Area, as outlined in the overview section of DEV1. PRIP considers the Structure Plan does not adequately capture potential noise effects from the Airport, and therefore does not appropriately address reverse sensitivity effects for its regionally significant infrastructure. The Structure Plan guidance confirms that subdivision and development within Bell Block Area Q needs to ensure that it does not compromise the efficient and effective operation, maintenance and future upgrading	Disallow

				and expansion of this regionally significant infrastructure. It notes interim measures have been proposed to protect the Airport. However, PRIP considers those interim measures inadequate to protect, and also provide for the Airport. A more conservative reverse sensitivity approach needs to be taken in respect of the Airport as regionally significant infrastructure.	
Don Crow	298.3	Oppose	DEV1 / Objectives / DEV1- O3	The submitter supports objective DEV1-O3 (Activities within and adjacent to the Development Area do not compromise the ability to develop the area in accordance with the Bell Block Area Q Structure Plan Development Area). PRIP lodged a primary submission stating that reverse sensitivity effects on the Airport should be avoided. PRIP considers the Structure Plan does not adequately capture potential noise effects from the established Airport. The objective, and provisions which seek to achieve the objective (including policies and rules (e.g. R1, R2, R3, R6, R7, R9, R17, R18)), do not appropriately address reverse sensitivity effects for its regionally significant infrastructure. Further, the Structure Plan does not adequately enable the future upgrade and development of the Airport. This is required to 'give effect to' higher order planning documents.	Disallow
Don Crow	298.7b	Oppose	DEV1 / Rules / DEV1-R27	The submitter opposes R27 (Subdivision and development in accordance with the structure plan - Stage 3E) because of its prohibited activity status and seeks a non-complying activity status apply. PRIP considers the prohibited activity status is appropriate, pending a future statutory process to assess and consider FUZ R.	Disallow
Horticulture New Zealand	457.63	Support	RPROZ / Policies / RPROZP2	The submitter supports policy RPROZ-P2 (potentially compatible activities). PRIP supports the policy which manages activities that are potentially compatible with the role, function and character of the Rural Production Zone, and in particular having regard to whether the activity will not result in conflict at zone interfaces.	Allow
Horticulture New Zealand	457.62	Support	RPROZ / Policies / RPROZP3	The submitter supports policy RPROZ-P3 (incompatible activities). PRIP supports the policy which is to avoid activities that are incompatible with the role, function and character of the Rural Production Zone.	Allow
Radio New Zealand Limited	545.15	Support in part	SUB / Policies / SUB-P8	The submitter seeks the policy include reference to avoiding reverse sensitivity effects on network utilities from new sensitive activities. Noting the Airport is defined as a network utility, PRIP supports this from a reverse sensitivity perspective.	Allow: 13. avoids reverse sensitivity effects on network utilities from new sensitive activities

Horticulture New Zealand	457.17	Support in part	SUB / Policies / SUB-P13	The submitter supports policy SUB-P13 (reverse sensitivity). PRIP supports the policy, and in particular incorporating sufficient separation from zone boundaries to minimise potential for reverse sensitivity conflicts. PRIP considers the policy should be more explicit to confirm the policy manages reverse sensitivity effects on the Airport.	Allow with a minor amendment for clarification purposes: incorporating sufficient separation from zone boundaries (<i>including special purpose zones</i>), transport networks, rural activities and rural industry to minimise potential for reverse sensitivity conflicts
J Swaps Contractors	204.6	Support	RPROZ / Policies / New policy	The submitter seeks an additional policy regarding reverse sensitivity. Noting the Airport adjoins Primary Production zoned land. PRIP supports this in principle.	Allow
Juffermans Surveyors Limited	182.10	Oppose	Rezoning	The submitter opposes the Rural Production zoning at 115 Airport Drive, New Plymouth and requests that it be rezoned to General Residential to be included within the Area Q Structure plan area. PRIP oppose the relief sought as this land is in close proximity to the Airport. Rezoning of this land will generate adverse reverse sensitivity effects, and also compromise the ability for the Airport, as regionally significant infrastructure, to operate and also upgrade and develop.	Disallow
Johnson Partnership	440.1	Oppose	Rezoning	The submitter seeks to rezone additional land at 115 Airport Drive from RPROZ to either Residential or Lifestyle. PRIP oppose the relief sought as this land is in close proximity to the Airport. Rezoning of this land will generate adverse reverse sensitivity effects, and compromise the ability for the Airport, as regionally significant infrastructure, to upgrade and develop.	Disallow