

Wellington International Airport Limited
Runway Extension Project

Section 87F(4) Report

Wellington City Council

Peter Daly

7 October 2016



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Proposal: Construction Operation and maintenance of an extension to the Wellington International Airport Runway, including reclamation of the coastal marine area.

Application 1: WCC Reference No: 357837

Application 2: GWRC Reference No: WGN160274

Applicant: Wellington International Airport Limited

Address: Wellington International Airport, land at the south end of the existing runway and Moa Point Beach and parts of the Coastal Marine Area within Lyall Bay, as described in the application.

Approx. Map References: NZTM: 1751135mE 5421917mN (southern extent of proposed runway extension)

NZTM: 1750574mE 5422763mN (middle of Lyall Bay approximately 450m from shore)

NZTM: 1751400mE 5422263mN (eastern extent of proposed remediation at Moa Point Beach)

NZTM: 1751487mE 5422575mN (hillock area and construction and stockpile compound)

NZTM: 1751238mE 5421784mN and 1750821mE 5421882mN and 1750822mE 5422163mN (boundary of temporary mooring buoys)

Report prepared by:	Peter Daly	Senior Consents Planner, City Planning		07/10/16
Report reviewed by:	Bill Stevens	Resource Consents Team Leader, City Planning		07/10/16

PREAMBLE

1. My name is Peter Daly. I hold the position of Senior Consent Planner at the Wellington City Council ('WCC') where I have been employed since 2015. My role involves processing a variety of applications sought under the Resource Management Act 1991 ('the Act') through various parts of Wellington City.
2. I hold the qualification of a Bachelor of Resource Management and Environmental Planning (Hons) from Massey University. I am a member of the New Zealand Planning Institute.
3. Although I am employed by WCC, which is also involved in this application as a shareholder in Wellington International Airport Ltd, my role is in a regulatory capacity within the City Planning Unit.
4. I can confirm that I have visited the application site(s) on numerous occasions and I am familiar with the surroundings.

SCOPE OF ASSESSMENT

5. The Wellington International Airport Runway Extension Project ('the Project') consists of one proposal for the construction, operation and maintenance of the runway extension, requiring resource consents from both WCC and Greater Wellington Regional Council ('GWRC'). These resource consents have been sought concurrently by the applicant.
6. The Project involves activities in the coastal marine area ('CMA') and on the landward side of mean high water springs ('MHWS'), as is set out on **Figure 1** below:

Fig 1. WIAL Runway Extension project site



Source: AEE, Pg 10, Figure 1-6

7. This report is completed as required under section 87F(4) of the Resource Management Act ('the Act') and will focus principally on the assessment of the land use consent application within the jurisdiction of WCC. A separate section 87F(4) Report has been prepared by Ms Jude Chittock and Ms Kirsty van Reenen on behalf of GWRC in relation to the resource consent applications within its jurisdiction.
8. As the primary focus of this report is in relation to the matters directly relevant to the WCC land-use consent, there are certain aspects of the assessment where I have relied on the conclusions in the GWRC report where those matters typically lie within the jurisdiction of GWRC and/or to avoid unnecessary repetition. I have also relied on the expert advice (attached as Annexure 1 to 7 to this report) from the following advisers:
 - Nigel Lloyd – Construction and Operational Noise (**Annexure 1**)
 - Dr Michael Steven – Recreation and Landscape, Natural Character, and Visual Amenity (**Annexure 2**)
 - Steve Spence – Traffic (**Annexure 3**)
 - Vanessa Tanner – Heritage and Archaeology (**Annexure 4**)
 - Gregor McLean – Erosion and Sediment Control (**Annexure 5**)
 - Louise Wickham – Air Quality (**Annexure 6**)
 - Greg Akehurst – Economic Impacts (**Annexure 7**)

STRUCTURE OF THIS REPORT

9. The structure of this report is as follows:
 - Section 1 sets out a **Description of the Wellington International Airport Runway Extension Project**
 - Section 2 provides a **Description of the Site and Surrounds**
 - Section 3 sets out the relevant **Planning Framework**
 - Section 4 outlines **Written Approvals and Consultation**
 - Section 5 addresses **Notification and Submissions**
 - Section 6 provides an overview of the **Statutory Considerations**
 - Section 7 provides an assessment under **Section 104 of the Act**
 - Section 8 provides an **Overall Evaluation of Part 2 of the Act**
10. In addition to the expert advice listed above I have included the Recommended Conditions of Consent – joint set issued for WCC and GWRC consents (**Annexure 8**)

BACKGROUND

11. On Friday 29 April 2016 Wellington International Airport ('WIAL') lodged an application for resource consent from WCC and GWRC for the Project. This resource consent application included a request for the application to go directly to the Environment Court for determination under the direct referral process.
12. Between May and July 2016 GWRC and WCC made 4 requests to the applicant for further information under section 92(1) of the Act. Responses were provided to these requests.
13. On Friday 1 July 2016, 1419 specifically identified parties were served notice of the application. The application was publicly notified in the Dominion Post on Saturday 2 July 2016, and in The Wellingtonian and Cook Strait News on Thursday 7 July 2016. Signs advertising the consent application were erected at Moa Point beachfront and within the carpark on Moa Point Road adjacent to the Corner surf break on Thursday 7 July 2016. The sign at the Corner surf break was damaged by a storm event and removed on 7 August 2016 as it was obstructing vehicle movements within the carpark.
14. By close of the submission period a total of 776 submissions were received including 34 late submissions. 227 submissions were received in support (either in full or in part) and 527 submissions were received in opposition. 17 submissions were neutral and 5 were with conditional support. A total of 34 late submissions were received - 14 in support, 19 in opposition and 1 was neutral. All late submissions were accepted.
15. On 22 July 2016 the requests for direct referral were granted by GWRC and WCC to allow the publicly notified resource consent applications relating to the runway extension to be determined by the Environment Court.

SECTION 1 - DESCRIPTION OF THE WELLINGTON INTERNATIONAL AIRPORT RUNWAY EXTENSION PROJECT

16. A full description of the Project is provided in the Applicant's Assessment of Environmental Effects ('AEE'). GWRC have also provided a description of the proposal in its section 87F report (paragraphs 40-60).
17. I consider the Project description provided in both the AEE and the GWRC section 87F report to be an accurate representation. Therefore, I adopt these assessments and do not cover this matter further.
18. I also note that as required by Schedule 4 of the RMA, the applicant has provided an assessment of alternatives with respect to different runway extension configurations, and alternative airport sites. Details of the alternatives assessment are set out in Part 5 of the AEE.

SECTION 2 - SITE DESCRIPTION AND SURROUNDS

19. A full description of the site description and surrounds is provided in the AEE. GWRC has also provided a description of the site and surrounds in its section 87F report (paragraphs 10-39).

20. I consider the site and surrounds description provided in both the AEE and the GWRC section 87F report to be accurate. Therefore, I adopt these assessments and only provide a brief summary below.
21. The area of the proposed runway extension ('the application site') is situated on the Wellington South Coast, south of the existing runway between Moa Point Bay and Lyall Bay. The area of the proposed works is illustrated at **Figure 1** above.
22. The application site largely consists of the coastal marine area extending into Lyall Bay towards Cook Strait, connecting onto the existing airport reclamation at the southern of the existing runway.
23. Immediately adjoining the application site to the north is Wellington International Airport, and associated industries, the Moa Point Wastewater Treatment Plant, and the Miramar Golf Course. To the east is Moa Point Road, a coastal road that continues along the south coast of the Miramar Peninsula. 19 residential houses are located along the north-east side of Moa Point Road, and east of the proposed runway extension. The residential suburb of Strathmore Park, located in an elevated position, is situated east of the airport and the proposed runway extension.
24. To the west is Lyall Bay, a popular south coast beach used for a range of recreational activities including being widely recognised as a popular surf beach. The land surrounding Lyall Bay is largely residential, with an area of light industrial and commercial activities immediately west of the airport in the areas around Kingsford Smith Street and the southern end of Tirangi Road.
25. The wider Lyall Bay marine environment is characterised by Hue te Taka Peninsular and Moa Point at the south-west, Lyall Bay Beach at the northern head of the bay, Arthurs Nose, Waitaha Cove, and Te Raekaihau Point along the western side, and Cook Strait towards the south.

SECTION 3 - PLANNING FRAMEWORK

Notations

26. The application site is subject to the following District Plan notations:
 - Hazard (Ground Shaking) Area (District Plan Map 5);
 - Principal Road, under the existing runway at Moa Point (Map 33);
 - Wellington Air Noise Boundary (Map 35)
 - Designation G2 – Airspace in the vicinity of Wellington International Airport (Maps 36-38)
 - Designation G3 – Runway End Safety Extension (RESA) – Southern End
 - Potentially Contaminated Sites within the Airport Area - Appendix 5, Chapter 11

Activity Status

27. Construction, operation and maintenance of an extension to the Wellington International Airport Runway is a **Discretionary (Unrestricted) Activity** under the Wellington City District Plan. The principal 'triggers' for resource consent are outlined below.

Wellington City District Plan

28. A large portion of the site is located in the Coastal Marine Area, which is outside the jurisdiction of the Wellington City Council District Plan. Of the area of application site currently within the jurisdiction of WCC, the proposed development is predominantly located in the Airport Precinct, which provides for any activity related to the 'primary function of the airport' as a permitted activity (subject to conditions).

29. The District Plan defines the 'primary function of the airport' as:

'...the transport of people and cargo by aircraft and any ancillary activity or service that provides essential support to that function. This includes, but is not limited to, aircraft operations, airport operational activities (such as runways, traffic control structures and terminal buildings), cargo warehouses and other storage facilities, airport travellers' accommodation and services, vehicle parking and servicing, aircraft catering and servicing, retail and commercial services that support airport activities (provided that such retail and commercial services are located within the Terminal Area), internal roading, access and service ways.'

30. The balance of the application site is Open Space B land and Business 1 zone.

31. The Project requires consent for the following activities:

Airport Precinct – Chapter 11:		
Rule 11.3.1	<p>Construction, operation and maintenance of the proposed runway extension, and associated infrastructure and structures (including fencing and utilities) on land above legal road (Moa Point tunnel underpass).</p> <p>This proposal does not comply with permitted activity standard 11.1.1.8 in that an existing grass boundary adjoining Moa Point Road will not be retained as part of the proposed works.</p>	Discretionary (Restricted)
Rule 11.3.3	<p>Temporary construction activities/compounds, which includes site offices and facilities, compounds and laydown areas, and material stockpiles. These activities do not comply with the following permitted activity standards:</p> <ul style="list-style-type: none"> • 11.1.1.1.8 - Land based noise operations • 11.1.1.3 – Dust • 11.1.1.6 – Lighting 	Discretionary (Restricted)

Rule 11.3.1	Construction of new access ways in the airport precinct.	Discretionary (Restricted)
Open Space B		
Rule 17.2.4	Modification to indigenous vegetation (if present) within the construction footprint.	Discretionary (Restricted)
Rule 17.3.2	Any recreational and other activities in the Open Space B or C area not provided for as a permitted activity. The proposed runway extension is not provided for as a permitted activity.	Discretionary (Unrestricted)
Section 89 of the RMA & Rule 3.8.2	The use of reclaimed land is assessed against the rules of the adjoining area. In this case, the proposed development adjoins the Open Space B zone. Under the Open Space B rules, the proposed runway is not provided for as a permitted activity.	Discretionary (Unrestricted)
Utilities		
Rule 23.3.3	Construction of new underground utility structures or underground lines to provide for temporary construction activities, and/or the relocation of existing network utility structures or lines to provide for the construction, operation and maintenance of the runway extension. These activities do not comply with the following permitted activity standards: The construction, alteration of and addition to underground utility structures or underground lines: <ul style="list-style-type: none"> • on or in Open Space B and C Areas and Conservation Sites that are not on formed legal roads or accessways; or • that do not meet the Permitted Activity conditions 	Discretionary (Restricted)
Earthworks – Chapter 30:		
Rule 30.2.1	The proposal will involve earthworks that do not comply with the following permitted activity standards: <ul style="list-style-type: none"> • 30.1.2.1(a) with respect to area and height of earthworks, and • 30.1.2.2 with respect to the distance from the coastal marine area. 	Discretionary (Restricted)

Land Contamination

32. The Project includes proposed construction depots that are located on areas of the Airport Precinct that are illustrated in Appendix 5 - Chapter 11 as being potentially contaminated sites. Accordingly, there is the potential for land contamination effects resulting from the proposed development.
33. The area of the proposed depot sites located in the potentially contaminated land area is currently sealed, and the applicant has verbally confirmed that it is not proposed to undertake excavations in this area.
34. The applicant has not sought any consent's under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health, or the contaminated land rules for the Airport Precinct. I am satisfied that in the absence of any earthworks or ground disturbance, this proposal will not trigger resource consent under the abovementioned National Environmental Standard or Airport Precinct Rule 11.2.4.
35. Additionally, I am satisfied that the sealed nature of the site and absence of any earthworks or ground disturbance will largely avoid contaminated land effects. In the event that ground disturbance is required, a separate consent under the National Environmental Standard and the Airport Precinct Rule 11.2.4 can be sought, if necessary.

GWRC Regional Plans

36. The Project requires consent under a number of regional plans, which are outside the jurisdiction of WCC. GWRC has provided in its section 87F report a full assessment of the Project against the following Regional Plans considered relevant to this proposal:
 - Operative Regional Coastal Plan
 - Operative Regional Plan for Discharges to Land
 - Operative Regional Air Quality Management Plan
 - Proposed Natural Resources Plan for the Wellington Region ('PNRP').
37. The GWRC assessment concludes that the Project is to be considered a Discretionary (Unrestricted) Activity under its relevant Regional Plans. I refer to the GWRC section 87F report for a full description of the Regional Plan matters.

Overall Activity Status

38. In relation to all consent/permits sought from either WCC or GWRC, they are to be assessed overall as a **Discretionary (Unrestricted) Activity**. This overall classification is also accepted by the applicant (see 1.4.4 of the AEE).

SECTION 4 - WRITTEN APPROVALS AND CONSULTATION

39. No written approvals have been provided as part of this application.

40. The applicant has undertaken a public consultation programme prior to lodgement, which involved the following:
- Making information and updates (as well as technical reports prior to lodgement) available on the project website.
 - Hosting three public open days during the first weekend of December 2015.
 - Meetings and individual consultation with neighbours, affected parties, regulatory authorities and key stakeholders.
 - Providing opportunity for the public to provide feedback or subscribe to updates on the project.
 - An advertising campaign and media releases around key consultation events and timelines.
41. Further details of this consultation are outlined at Section 6 of the AEE. A summary of public feedback received is set out at Section 6.6 of the AEE, but in short, the themes can be summarised into the following matters:
- Benefits of the project
 - Funding concerns
 - Project viability
 - Construction traffic effects – haulage route
 - Construction noise effects
 - Visual and landscape effects
 - Effects on the coastal marine area
 - Operational noise effects
 - Natural hazards and climate change
 - Alternatives

SECTION 5 - NOTIFICATION AND SUBMISSIONS

42. A total of 776 submissions were received in relation to the applications. The general position of the submissions are outlined below:

General Position of Submission	Total
Oppose	527
Support	227
Conditional	4

General Position of Submission	Total
Submissions that are Neutral	18
Total Submissions received	776

43. These submissions have been summarised and are attached as Appendix 12 to the GWRC report.
44. Issues raised by submissions include:

Issues	No. of times issue raised
Traffic effects including construction, airport operational and/or haul route traffic	256
Visual effects including landscape and natural character effects and/or change in outlook	43
Effects from noise (construction, airport operational and/or haul route) and vibration	202
Air quality effects including health & nuisance effects, construction dust and truck discharges	73
Effects on urban-design including open space, pedestrian and cycle changes/access around Moa Point, seating, gateway landscape and/or underpass	6
Effects from natural hazards and climate change	183
Effects on surf including wave height and period, refraction and/or Submerged Wave Focussing Structure	252
Economic effects including economic impact assessment, cost benefit analysis, funding, project viability and/or benefits	492
Effects on tangata whenua and cultural values	14
Recreational effects	220
Ecological effects	209
Effects of fill including sediment, water clarity, contaminants in fill, turbidity and/or fill source	103
Effects of erosion including beach remediation, foreshore erosion and/or accretion	19
Effects on utilities such as Moa Point wastewater pipeline, stormwater networks and/or underground cables	36

SECTION 6 - STATUTORY CONSIDERATIONS

45. Section 87F of the Act outlines that if a consent authority grants a request for direct referral it must prepare a report on the application and in the report, the consent authority must—

- (a) *address issues that are set out in sections 104 to 112 to the extent that they are relevant to the application; and*
 - (b) *suggest conditions that it considers should be imposed if the Environment Court grants the application; and*
 - (c) *provide a summary of submissions received.*
46. The application(s) are for a Discretionary (Unrestricted) Activity. Accordingly, the consent authority may grant or refuse consent under section 104B of the Act and, if granted, may impose conditions under section 108 of the Act.
47. Section 104(1) of the Act sets out matters a consent authority shall have regard to in considering an application for resource consent and any submissions received. Subject to Part 2 of the Act, the matters relevant to this proposal are:
- (a) *any actual and potential effects on the environment of allowing the activity;*
 - (b) *any relevant provisions of:*
 - (i) *a national environmental standard:*
 - (ii) *other regulations:*
 - (iii) *a national policy statement:*
 - (iv) *a New Zealand coastal policy statement:*
 - (v) *a regional policy statement or proposed regional policy statement:*
 - (vi) *a plan or proposed plan.*
 - (c) *any other matter the consent authority considers relevant and reasonably necessary to determine the application.*

SECTION 7 - SECTION 104(1)(A) EFFECTS ASSESSMENT

48. The assessment of environmental effects below considers the key effects arising within the jurisdiction of WCC. These effects include:
- Construction (including haulage), Operational and Recreational Noise and Vibration
 - Landscape, Natural Character and Visual Amenity
 - Construction and Operational Traffic
 - Effects on Historic Heritage and Archaeology
 - Cultural Effects
 - Earthworks Effects, including dust, erosion and sediment control
 - Recreational Effects
 - Natural Hazards Effects

- Land Contamination Effects
- Effects on Utilities
- Economic Effects

Construction, Operational and Recreational Noise and Vibration effects

Construction Noise

49. The Project has the potential to generate adverse noise effects given the scale of works proposed, the duration of the construction project, and the proposed night-time construction works. In addition, the Project proposes road haulage of fill during off-peak periods (9.30am-2.30pm, and 10pm-6.00am) during weekdays, which will generate traffic noise effects on those properties along the haulage route.
50. The applicant has provided a Construction Noise Assessment, prepared by AECOM Consultants, which assesses the noise effects associated with constructing the runway extension, and the land-based transportation of construction materials (including fill) to the site. The report also identifies measures to mitigate such noise effects.
51. In terms of the planning context, the Wellington City District Plan does not specifically regulate construction noise. However, the District Plan definition for 'Noise Emission Level' (Pg 3/75) states that construction work... *'shall comply with, and be measured and assessed using, the recommendations of NZS6803P: 1984'*. This Standard has been superseded by NZS 6803: 1999 - 'Acoustics - Construction Noise', which is a technical revision of the provisional standard. The AECOM report uses this updated Standard in its assessment.
52. In other words, the District Plan diverts to the construction noise standard for the management of construction noise. In addition, section 16 of the Act requires all occupiers of land to adopt the best practicable option to reduce the emission of noise to a reasonable level and section 17 imposes the duty of every person to avoid, remedy, or mitigate any adverse effects on the environment arising from an activity carried out on, by or behalf of that person.
53. The applicant's construction noise assessment has been reviewed by Nigel Lloyd of Acousafe Consulting and Engineering Ltd, and his assessment of the proposal is included at Annexure 1 of this report.
54. In summary, Mr Lloyd reaches the following conclusions with respect to construction noise:
 - The Project includes a construction duration of 48 months (or greater), and due to airport operations, construction will be focused at night when construction activity is usually avoided near residential activities.
 - The nearby residential properties on Moa Point Road will be significantly affected by the proposed night time construction noise (with noise levels of up to 14dB over the night limit of 45dB_{L_{AEQ}}), and some properties on Kekerenga and Ahuriri Streets to a lesser extent will also be significantly affected (ie, up to 8 dB over the night limit of

45dB_{L_{AEQ}}). The noise effects will have the potential to result in sleep disturbance and associated health issues for the residents of the Moa Point Road properties, and sleep impairment for the residents of some properties on Kekerenga and Ahuriri Streets.

- There are limited opportunities for mitigation at source, namely onsite construction noise mitigation measures, or mitigation measures on public land.

55. With respect to traffic noise generated by the haulage activities, Mr Lloyd reaches the following conclusions:

55.1. The applicant has assessed the night truck movements in terms of traffic noise, and has established a programme of reduced truck numbers to keep the increase in noise emissions at an acceptable level. This approach is supported and would ensure truck noise does not become significant for neighbouring residents to the haul route.

55.2. The applicant's noise assessment does not address the effects of the outbound day haulage route along Lyall Parade and Onepu Road. This is less likely to have significant effects given it's during the day, but this assessment should still be undertaken to provide a clear understanding of the overall traffic noise.

56. I accept these conclusions reached by Mr Lloyd with respect to construction noise and construction traffic noise.

57. With respect to mitigation measures proposed by the applicant, the Mr Lloyd has identified that the mitigation measures targeted at a set number of properties (on Moa Point Road, Kekerenga and Ahuriri Streets) are essential, and without this, the noise effects on occupants of these properties will be potentially significant. Mr Lloyd further recommends that these mitigation measures be included as consent conditions. I note that these proposed mitigation measures, such as relocation and acoustic insulation of properties, rely on the co-operation and permission of the property owners or occupiers.

58. Therefore, while I acknowledge that these mitigation measures may significantly improve the impact of construction noise on these parties, there is no obligation for the owners or occupiers to accept alterations to their houses or to temporary relocation during the construction period. In the event that such measures are not accepted by them, there will remain a significant noise effect on these parties.

59. In making an overall assessment as to whether the Project will have significant construction noise effects, it ultimately will depend on whether the applicant can manage to obtain agreement from these people for either mitigation option. If this cannot be obtained, then there remains a significant construction noise effect, which I consider will be unacceptable.

Operational Noise

60. The Project will increase the size of the existing runway, enabling larger aircraft to arrive and depart from Wellington Airport, and facilitate increased air traffic. The use of the facility by larger aircraft will potentially generate greater noise emissions than the noise

emissions of those aircraft operating today. It will also alter the touchdown location and the 'start of the roll' location at the southern end of the runway. This means that the shape of the existing noise contour will change with an increase in noise occurring further to the south.

61. The applicant has provided an Operational Noise Assessment, prepared by Marshall Day Acoustics, which assesses the noise effects associated with the airport operation once the proposed runway extension has been completed. This operational noise assessment has been reviewed by Nigel Lloyd of Acousafe Consulting and Engineering Ltd, and his assessment of the proposal is included in his report at Annexure 1 of this report.
62. Chapter 11 of the District Plan includes specific rules for the management of aircraft noise emitted from Wellington Airport. Mr Lloyd has provided a useful explanation as to how the 'rolling 90 day' noise rules work, and how the current noise emissions compare with that provided for by the District Plan rules. I concur with his explanation regarding the district plan provisions, which should be read alongside this assessment. I note from his assessment that current noise emissions from the airport are less than what is permitted by these noise rules.
63. In terms of noise emissions resulting from the proposed runway extension, Mr Lloyd has confirmed that there is likely to be an increase in noise emissions as a result of larger aircraft utilising Wellington Airport and due to the change in location of touchdown and 'start of roll'. However, Mr Lloyd also advises that such noise is unlikely to breach the 90-day emission limit as imposed by Rule 11.1.1.1, and will not breach any of the Air Noise Boundary (ANB) controls. He concludes that the District Plan requirements imposed by the ANB will be complied with up until 2035 and that the change in noise levels will, on average, barely be perceptible.
64. I accept the conclusions reached by Mr Lloyd, and consider that while the operational noise effects are likely to be greater than those currently experienced, they will be within the noise parameters of the permitted activity standards in the District Plan.
65. Having considered the Operational Noise Report prepared by Marshall Day Acoustics and provided with the application, and the subsequent advice provided by Mr Lloyd, I consider that the proposal is acceptable in relation to operational noise.

Recreational Noise

66. The AECOM report predicts noise levels at various recreation areas. Mr Lloyd considers that construction noise effects will not be significant at Lyall Bay for recreational activities such as walking, jogging, cycling and dog walking. However, Moa Point Beach is more exposed to construction noise and Mr Lloyd considers that walkers and cyclists would experience noise from time to time that could impact on their enjoyment of the area. Most of these recreational activities are likely to be transient in this area and Mr Lloyd considers this noise impact will be less significant.
67. The noise from the proposed excavation works and stockpiling activities taking place by Stewart Duff Drive are close to the southern end of the golf course and will cause a noise impact on the southernmost holes. This noise is likely to be significant for golfers using the far south end of the course, when excavations and stockpiling is taking place.

68. Having considered advice provided by Mr Lloyd, including his proposed conditions, I consider that the proposal is acceptable in relation to recreational noise effects.

Construction Vibration

69. Mr Lloyd has also considered the extent of construction vibration which might be experienced at properties in close proximity to the works. While he believes any effects in this regard are likely to be low, he is still of the view that a vibration management condition should be included. Based on Mr Lloyd's advice, and with the inclusion of such a condition, I consider that the proposal is acceptable in relation to any potential construction related vibration.

Landscape and Visual Effects

Landscape, Natural Character and Visual Effects

70. The Project will result in a large reclamation from the southern end of the existing runway into Lyall Bay. The applicant has provided a Landscape and Visual Assessment (Technical Report 24), prepared by Boffa Miskell Ltd and Natural Character Assessment (Technical Report 25) prepared by Mr Frank Boffa.
71. These reports have been reviewed by Landscape Architect, Dr Michael Steven, who has provided advice to GWRC and WCC on landscape and visual effects, along with effects on recreation and natural character. Dr Steven's report is attached at Annexure 2 of this report.
72. With respect to landscape, natural character and visual effects, Dr Steven reaches the following conclusions:
- The post construction landscape effects on the eastern side of Lyall Bay will be high, rather than moderate as suggested by the applicant. However, such effects are acceptable and can be mitigated to an extent through landscape design and ecological restoration initiatives.
 - The landscape/seascape character effects on the western side of Lyall Bay will be low, and therefore acceptable.
 - The visual effects from Moa Point beach and adjacent residential dwellings at Moa Point Road will be unacceptably adverse, and not capable of being mitigated.
 - The visual effects in all other areas will be minor, or less than minor and acceptable.
 - The scale of the changes to the Moa Point embayment in particular justifies a significant input of ecological restoration and design expertise to mitigate the natural character effects of the proposal.
 - There are no areas of outstanding natural character within Lyall Bay or its component areas, or within the south coast in the immediate vicinity of Lyall Bay.
 - Two component areas of the coastal environment will exhibit reductions in natural character post-construction. These are:
 - The natural character of the Moa Point Embayment will be reduced from

moderate to low,

- The natural character of the Airport component area will be reduced from low to very low.
 - The natural character effects on the Airport component area are acceptable, provided the proposed mitigation measures are implemented.
 - The natural character for the Moa Point embayment area will change from being Moderate (Pre-construction) and Low (Post-construction). In terms of the RMA scale of adverse effects, this is an adverse effect that is more than minor, but able to be mitigated to an extent by ecological restoration and habitat creation and enhancement
 - In all other component areas of Lyall Bay the proposal will have effects on natural character which are less than minor, and acceptable.
73. In terms of assessing landscape and visual effects, I note that the vast majority of the reclamation is located in the coastal marine area, and as such, lies within the jurisdiction of the regional council. GWRC has provided a comprehensive assessment in its section 87F report of the landscape, natural character and visual effects based on the advice provided by Dr Steven. Given this, I defer this part of the assessment to GWRC.
74. In terms of the landscape, natural character and visual effects of the landward component of the Project, this is limited to the area where the proposed runway will connect with the land above the MHWS at the southern end of the existing runway. Also relevant are the proposed recreational and public amenity improvements above the MHWS, including the proposed pathway and seating along the western side of Moa Point Road (adjoining Lyall Bay) and amenity works at Moa Point.
75. With respect to how the proposed reclamation will be integrated with the existing runway and the wider Moa Point embayment, Dr Steven considers that this requires further consideration as the proposed reclamation shape and edge treatment (i.e. the proposed form of the accropodes) will not integrate well with the existing landscape of the Moa Point embayment. Dr Steven provides a detailed explanation as to why this request is necessary, and insofar as it affects the land above the MHWS, I concur that this is a relevant issue that needs addressing.
76. The applicant is proposing mitigation measures that include:
- Creation of, and improvement to, marine and terrestrial ecological habitats (i.e. in the rock dyke and exterior armouring);
 - Improved access and parking, including safety improvements for pedestrians and cyclists; and
 - Additional and improved recreational facilities and opportunities (i.e. improved access to CMA and the proposed SWFS).
77. With respect to creating and improving marine and terrestrial ecology (which is particularly important for preventing a reduction in the natural character rating of the Moa

Point embayment), this has been discussed in the section 87F report prepared by GWRC. Accordingly I defer to GWRC with regard to the appropriate form of mitigation which might be necessary.

78. With respect to improved access and parking, and additional and improved recreational facilities and opportunities, Dr Steven considers that:

'While the proposals illustrated are indicative at this stage, the initiatives are to be commended and will constitute a significant improvement to public access options and the enjoyment of the waterfront amenity and recreation within this part of the south coast. I support these.'

79. The improved access and parking, and additional and improved recreational facilities have been discussed with the relevant organisations within WCC at a preliminary level, and WIAL have provided a preliminary Memorandum of Understanding to WCC with respect to undertaking these works on WCC land. While this has not been resolved, at this stage no insurmountable issues have been raised. I am satisfied that the details of such works can be finalised at the detailed design stage and managed through the provision of a Landscape and Urban Design Management Plan (LUDMP). I recommend that a consent condition be included in this regard.

80. For the reasons outlined above, I consider that the:

- Landscape and natural character and visual effects above the MHWS will be acceptable.
- Visual amenity effects on Moa Point residents and users will be unacceptable, and are unable to be mitigated.
- Visual amenity effects on all other areas will be acceptable.

Construction and Operational Traffic Effects

81. The Project has the potential to generate traffic effects as a result of the proposed construction activity, and longer term operational traffic from increased patronage of the airport.
82. The transportation effects have been assessed for the applicant in the Transportation Assessment Report, prepared by Traffic Design Group Ltd, and included in the application (Technical Report 9, Vol.3). This report has been reviewed and analysed by WCC's Chief Transport Advisor, Mr Steve Spence. Mr Spence's review is included at Annexure 3.
83. The key components of Construction and Operational Traffic are addressed further below.

Construction Traffic

84. The application states that there are a number of potential sources of reclamation fill. However, in the absence of any certainty around these sources, it is proposed by the applicant that the worst case scenario is assessed from a traffic perspective, that being that all fill will be sourced from Kiwi Point and Horokiwi Quarries and transported to the site via road haulage. Therefore, the Council's construction traffic assessment has been

based on road transport of all fill within the parameters (i.e. truck numbers, haulage routes, operating times, etc) proposed by the applicant.

Haulage Traffic

85. The haulage traffic is likely to have the most discernible level of traffic effects given the overall volume of heavy trucks on the roading network where land based transportation of fill material is adopted (up to 620 daily truck movements/60 trucks per hour). The applicant has acknowledged these effects, and has proposed haulage routes and variable truck movements (i.e. differing truck numbers at different times of the day and week) to address them.
86. The Transportation Assessment Report prepared by the applicant, and the subsequent further information provided by the applicant, provides an assessment of the haulage traffic effects.
87. Mr Spence has reviewed these assessments and has reached the following conclusions:
- The proposed haulage traffic travel times avoid commuter and school traffic peaks, and weekends, which is appropriate.
 - The route selection, being predominately the state highway network with day time use of Lyall Parade and Onepu Road, is appropriate.
 - The use of high performance motor vehicles (HPMV's) is an appropriate choice of haulage vehicle (i.e. it will minimise the total number of truck movements required). However, there is still some outstanding information requested from the applicant in terms of how these vehicles will use certain parts of this road.
 - The applicant has not provided an assessment of the alternative transport routes in the event that a primary transport route is affected, such as the Mt Victoria tunnel being closed. An assessment of the suitability of the alternative routes and what measures might be required to accommodate their use by HPMV's is required and following that, included in the construction traffic management plan. The traffic effects of such can then be managed through a requirement for a traffic management plan to be submitted for all alternative routes used for more than 24 hours.
 - Haulage via road is, from a traffic perspective, the worst case scenario. While the applicant has requested the worst case scenario be assessed as part of this application, this should be avoided if at all possible and should only be used if all other non-road based options are exhausted.
 - The assessment does not assess the potential amenity effects arising from the haulage of fill.
 - The proposed routes are acceptable from a technical standpoint (accommodation within the road network, road user safety and network capacity) subject to the outstanding information above being provided.
88. Overall, Mr Spence concludes that from a technical perspective, and subject to the further information regarding road capacity being submitted, that the traffic effects along

the haulage route will be no more than minor. He also states that an alternative to road haulage (i.e. marine based transport) will be a far superior option. I accept the advice of Mr Spence.

89. With respect to Mr Spence's reference to social and amenity effects of the haulage route not being addressed, I note that the effects of dust, visual effects, air quality effects, and noise have been addressed by other experts. Based on Mr Spence's assessment of the roading capacity, and that it is capable of handling the nature of the traffic, I do not consider that any additional amenity effects would be significant.

Other Construction Traffic and Parking Effects

90. In addition to the traffic generated by the road-based haulage of fill, the proposed development will result in additional construction staff transport to and from the site, associated parking and the haulage of heavy machinery to the site.
91. The applicant's Transportation Assessment Report details that construction traffic movement will be monitored and managed by the contractor. Parking for construction staff will be established within site compounds, which will be established on both sides of the runway.
92. Mr Spence, in reviewing this report, has confirmed that he does not see construction staff traffic generation and parking as having any significant effect on the roading network and considers that it is a matter best dealt with at the time a construction traffic management plan is developed. Given the land available to the airport, I do not see there to be any practical reason why the applicant cannot provide adequate parking for construction staff. Furthermore, Mr Spence has not raised any concerns with respect to transporting heavy machinery to the site.

Operational Traffic Generation

93. The proposed runway extension will facilitate larger aircraft, potentially accommodating more passengers, which in turn will generate additional traffic to and from the airport.
94. The applicant's Transportation Assessment Report has assessed the impact of increased traffic as a result of the proposed runway extension, and compared it to the projected traffic under a business as usual approach. Mr Spence has reviewed this report, and advises that the difference between two equates to around an additional three cars per minute, which he considers relatively low and manageable.
95. In considering the effects of airport operational traffic generation, I note that the District Plan does not include any provisions relating to the control of airport traffic as the airport develops. Therefore, assessing projected traffic increase against that of a business as usual approach is a plausible comparison.

Effects on Historic Heritage and Archaeology

96. There are no confirmed historic heritage resources located in the application site and therefore, no direct effects on known heritage items. However, the application site is in relatively close proximity to several natural and physical resources that contribute to the understanding of and appreciation of New Zealand's history and culture.

97. The applicant has provided an Archaeological Assessment (Technical Report 22, Vol.3) prepared by Archaeologist Kevin Jones, which assesses the archaeological significance and effects of the Project.
98. This Archaeological Assessment has been reviewed by WCC's Heritage Advisor, Vanessa Tanner. Ms Tanner's report is attached at Annexure 4 of this report, and includes a map showing those items in close proximity to the proposed runway extension that are recognised as having heritage value by WCC, GWRC, the Archaeological Association and Heritage NZ. In short, Ms Tanners report concludes that:
- The effect on known historic heritage items in the area is not significant.
 - Without a full archaeological assessment, including a survey of the seabed, it cannot be concluded there is no archaeological evidence on the seabed within the proposed reclamation area. This assessment needs to be undertaken.
 - Should any archaeological evidence be found as a result of an archaeological survey of the seabed and be adversely affected by the proposed reclamation, those effects could be adequately mitigated through archaeological investigation and recording.
 - As conditions of consent an ADP and the requirement to undertake an archaeological survey of the seabed, including methods for mitigating adverse effects should they be required, would be appropriate measures to manage and mitigate any potential effects on historic heritage, and are consistent with the objectives and policies of the District Plan.
99. I accept the conclusions reached by Ms Tanner, and consider it reasonable to impose a condition of consent requiring archaeological survey of the seabed to be undertaken.
100. Accordingly, I consider that subject to this condition being imposed, the heritage and archaeological effects of the proposal will be minor, and acceptable.

Cultural Effects

101. A Cultural Values Report ('CVR') and a Cultural Impact Report ('CIR'), prepared by Raukura Consultants, has been included with the application (Technical Reports 5 and 13 respectively). Both the CVR and CIR state that they have been prepared in consultation with the Port Nicholson Block Settlement Trust and Wellington Tenth's Trust.
102. The Wellington Harbour and the Coastal marine area (which includes the South Coast) are statutory acknowledgement areas under the Port Nicholson Block (Taranaki Whanui ki Te Upoko o Te Ika) Claims Settlement Act 2009 (Port Nicholson Act). In addition, the Wellington Harbour and Cook Strait are statutory acknowledgement areas in the Ngati Toa Rangatira Claims Settlement Act 2014 (Ngati Toa Act). Accordingly, it is noted that the Te Runanga o Toa Rangatira Incorporated and the Port Nicholson Block Trust have statutory acknowledgement of the areas adjacent to and in the vicinity of the application site.
103. The CIR provides concluding comments and recommendations on pages 14 and 15 respectively. In short, the concluding comments include:

- The area subject to the runway extension has already been subject to significant modification.
- No sites of significance to Maori will be affected. In particular, the old Moa Point is located under the existing runway, and the proposed extension will not affect Hue te Taka peninsular or Rangitatau Pa.
- While taonga (carved stone and bone items) along with moa bones have been found in the general area, this is relatively rare and an accidental discovery protocol will manage any findings.
- The new rocky coastline could provide a nursery capability and mitigate any adverse effects.
- The proposed extension will enable increased air travel opportunities, and Iwi will benefit from cultural and economic benefits to the region.

104. The CIR includes the following recommendations:

- That the report is taken into account in preparing the AEE.
- That Ngai Toa and Te Atiwa/Taranaki Whanui are involved in the development of an Environmental Monitoring Plan (EMP).
- An archaeological site examination is not required regarding pre-European archaeology.
- That the draft accidental discovery protocol (Appendix I, CIA) is included as a consent condition.
- That consultation with iwi manawhenua through Wellington Tenth's Trust, Port Nicholson Block Settlement Trust and Te Runanga o Toa Rangatira is ongoing through the consenting programme.
- That appropriate Maori cultural ceremonies are held when the project commences.

105. Port Nicholson Block Trust has not submitted on the proposed application. Te Runanga o Toa Rangatira Incorporated has submitted on the proposal and has outlined their neutral position on the Project. In particular, Te Runanga o Toa Rangatira's submission outlines their primary concerns around the effects on Kaitiakitanga and customary fisheries, and has supported a number of mitigation measures proposed by the applicant. They have also requested, as a condition of consent (if granted), that a memorandum of understanding (MOU) is established between Te Runanga o Toa Rangatira and WIAL to ensure engagement and collaboration between the two parties on the development of the Environmental Management Plan. While this something that the applicant refers to in the application, I do not consider it is appropriate to impose a condition requiring an agreement to be entered into with a third party.

106. A number of proposed conditions re designed to manage cultural effects, including:

106.1. The provision of an accidental discovery protocol,

- 106.2. The creation of an artificial reef to support recolonization of taonga species,
- 106.3. Conducting field species of taonga, and storing these species for re-planting onto the artificial reef structure.
- 106.4. The establishment of an Ecological Mitigation and Monitoring Plan, in consultation with Iwi.
107. Based on the above, and having regard to the statutory acknowledgements above and subject to the imposition of appropriate conditions, I consider that the cultural effects of the proposal will be minor and acceptable.

Earthworks Effects

108. The earthworks effects of the proposal relate to ground stability, visual effects, dust, silt and sediment run-off (including effects on the Coastal Marine Area), and the transportation of material.
109. The transportation of material has been addressed above as a construction traffic effect, and accordingly has not been repeated here.
110. In terms of erosion and sediment control, the primary area of earthworks is the construction and subsequent filling of the proposed reclamation area in the coastal marine area. As part of the reclamation, earthworks will extend onto the area of land zoned Open Space B to form the extension of the current runway. The receiving environment for all erosion and sediment run-off is most likely to be the coastal marine area.
111. GWRC has assessed the effects of erosion and sediment discharges to the CMA in its section 87F report. As part of this report, GWRC have reviewed the AEE and associated technical reports, and have concluded that such effects can be appropriately managed through the Construction Management Plan (CMP) and Erosion and Sediment Control Plan (ESCP), which are proposed as conditions of consent (with some amendments proposed by GWRC). I accept this conclusion.
112. In terms of earthworks stability, the applicant has undertaken geotechnical investigation to ascertain the ground conditions as part of the preliminary site investigations when selecting runway extension options. Subsequent investigations undertaken by AECOM identified ground conditions to have very low risk of seismic-induced liquefaction. Given that detailed design and construction methodology is yet to be determined, and that the fill material is not yet confirmed, further investigation on earthworks stability will be required prior to construction commencing. This approach is not uncommon for projects of such a scale, and I am satisfied that, subject to satisfactory information being provided on the structures seismic stability or confirmation that this can be addressed as part of the management plan certification process, the risk on instability will be low.
113. In terms of dust, the applicant has proposed that management of dust emissions will be undertaken through the Construction Air Quality Management Plan (CAQMP), which will be finalised with the successful contractor. From a dust management perspective, Louise Wickham Air Quality Specialist of Emission Impossible Ltd has assessed the Project on behalf of GWRC and WCC. Ms Wickham's Report is included at Annexure 6.

114. Of primary relevance to WCC is the management of dust emissions during the construction phase. In assessing the effects of dust emissions, Ms Wickham has outlined that while the development has the potential to generate dust emissions given the scale of earthworks proposed, she is satisfied that these can be appropriately managed through consent conditions. In this regard, she has recommended additional conditions, which can be included in the CTMP to minimise dust emissions. In summary, these address the following matters:
- 114.1. Limiting vehicle speeds on unsealed areas or access roads.
 - 114.2. Use of water as a dust suppression measure.
 - 114.3. Preventing deposition of earth, mud or other debris on public roads and/or footpaths.
 - 114.4. Use of wheel wash facilities.
 - 114.5. Undertaking construction activities in accordance with the Ministry for the Environment 'Good Practice Guide for assessing and managing the environmental effects of dust emissions', and the measures included in this guide.
 - 114.6. Managing dust complaints appropriately.
 - 114.7. Dust management training for staff and contractors.
115. I accept the advice of Ms Wickham that dust effects can be appropriately managed through the CAQMP, and consider that with these additional recommended conditions are appropriate.
116. In terms of visual effects of the earthworks, I acknowledge that the construction site will be visually unattractive during the construction phase. However, such effects will be limited to the construction phase and once completed, will be encompassed by the runway and reclamation breakwater. Once construction is complete, there will be no visual effects from the earthworks activity. The visual effects of the completed runway have been assessed by Dr Steven in his report and are addressed in the Landscape Effects assessment of this report.
117. Overall, having regard to the matters above, I am satisfied that the earthworks effects will be no more than minor. It is my opinion that these effects will be localised, and while the construction period is relatively long, such effects are not permanent, and the associated effects can be effectively controlled through appropriate consent conditions.

Recreation Effects

118. Given the nature of the Project and the length of the construction programme, the proposed development will result in recreation effects on the recreational users of the Lyall Bay and Moa Point areas.
119. An assessment on recreation (TRC report) has been prepared by TRC Tourism Ltd, and is included in the application documents (Technical Report 6, Vol.3). This report identifies the recreational activities occurring in the general vicinity of the Project as

including cycling, walking/running, dog walking, plane-spotting, sight-seeing, diving/spearfishing, fishing, swimming, body-boarding, surfing, windsurfing, stand-up paddle boarding, and surf-life saving. I accept that this includes the majority, if not all, the recreational uses of this wider Lyall Bay and Moa Point area.

- 120.** The TRC report provides an insight into where and when these activities are undertaken, and how different people use this area. For instance, the report states that while Lyall Bay is a popular surf beach attracting surfers from other areas in the region, survey results advise that users are more likely to use the area for social activities (cafes/play/sightseeing etc) and physical activity (cycling/running) as compared to water sports. This analysis was based on a range of techniques that are detailed in the TRC report. From this analysis, the applicant reaches a number of conclusions on the Projects impact on such users, and concludes that the effects on each of these recreational users will be minor, or less than minor.
- 121.** These abovementioned activities can be separated into two separate groups; land based recreational activities and those based in the coastal marine area. GWRC has assessed the effects on recreational users in the coastal marine area in its section 87F report, and accordingly I defer to GWRC with respect to such matters. Land-based recreational effects are considered to include walking/running/dog-walking, cycling, sightseeing, and plane spotting activities that are carried out on land.
- 122.** Technical Report 6 has been reviewed by Dr Steven. Dr Steven's report is included at Annexure 2.
- 123.** In reviewing the applicant's assessment, Dr Steven has raised concerns with the methods used to reach conclusions on the effects on different recreational users, and advises that further survey work would provide valuable information to supplement the information already submitted.
- 124.** With respect to the TRC conclusions that the effects on each activity will be minor, or less than minor, Dr Steven considers that in relation to surfing amenity, this has been understated. As outlined above, surfing effects is a matter addressed by GWRC, and accordingly, I defer to GWRC in this regard.
- 125.** In terms of effects on land-based recreational activities, these are considered to be more significant during the construction phase where noise, dust and road haulage are likely cause a level of disruption to, and affect the amenity of, recreational users. The level of effects will be more pronounced during weekends when recreational effects are increased. In considering the construction based effects, Dr Steven outlines that these particular matters are outside his area of expertise and fall within the expertise of other experts, but notes that these are matters that can generally be managed during the construction process. I concur with Dr Steven that these matters have been assessed by other experts, and are addressed elsewhere in this report. However for completeness, I note that these matters can be appropriately managed.
- 126.** Upon completion of the runway, the effects on land-based recreational activity will predominantly relate to landscape and visual amenity, and operational airport noise. These matters are addressed by other experts, and are discussed in the relevant sections of this report. The Project also includes recreational amenity improvements along the seaward side of Moa Point Road, which is currently characterised by the rock

rip-rap and offers little in the way of public access or amenity areas. Dr Steven considers that these proposed recreational amenity improvements will enhance recreational opportunities for walkers and runners in this area. I concur with this view.

127. Dr Steven considers that the effects on land-based recreational amenity will be minor, or less than minor, and acceptable. I concur with this summary, noting that many of the effects on land-based recreational activities are a combination of other effects addressed elsewhere in this report.
128. Turning to the further survey work, which the applicant proposes to undertake prior to the hearing (response to further information request 16 June 2016), I note that this is supported by Dr Steven and is unlikely to add significant value to the assessment on land-based recreational effects (as it is focused on water based recreational effects). However, such survey work should still cover such users to provide an accurate representation of how these areas are used.
129. Having considered the information in the TRC report, along with the subsequent advice of Dr Steven, I consider that the proposal is acceptable in relation to land-based recreational effects.

Natural Hazards Effects

130. Natural hazards are naturally occurring events, and given Wellington International Airport is a key piece of transport infrastructure, it is important to consider the potential effects of natural hazards on the Project.
131. The primary natural hazards considered relevant to this proposal are seismic and coastal (storm inundation, wave forces, tsunami and climate change) threats. I note that GWRC has assessed the effects of coastal based natural hazards in its section 87F report, and accordingly I defer to it with respect to such matters.
132. With respect to performance during seismic events, the applicant has advised that the Project will be designed to withstand a 500 year seismic event, and withstand a 2,500 year event without catastrophic failure.
133. The applicant has undertaken preliminary investigations when considering options for extending the runway to the north or south, which indicated that extending to the south would provide significantly increased ground conditions suitable to support the proposed runway extension as compared to extending to the north. The application outlines that while development to the south is a preferred option for ground stability reasons, a significant level of detailed design and engineering will need to be undertaken prior to construction commencing. This will include finer details relating to seismic performance of the reclamation.
134. I consider the approach undertaken by the applicant is acceptable, and consistent with the approach commonly adopted for larger civil construction projects. However, I consider that the applicant should adequately demonstrate that the Project can be constructed to withstand a significant seismic event prior to the hearing. Accordingly, I consider the effects in terms of natural hazards to be acceptable.

Effects on Utilities

135. A number of network utilities are located in close proximity to the application site, and therefore, the Project has the potential to disrupt or adversely affect the continued operation of such services. These services include the following:

135.1. Telecom Duct;

135.2. 11,000-V Cable;

135.3. 400V Cable;

135.4. Stormwater Line;

135.5. Dual 180mm concrete encased steel sewer line rising main;

135.6. 20mm water main;

135.7. Gas line; and

135.8. Moa Point ocean sewer outfall

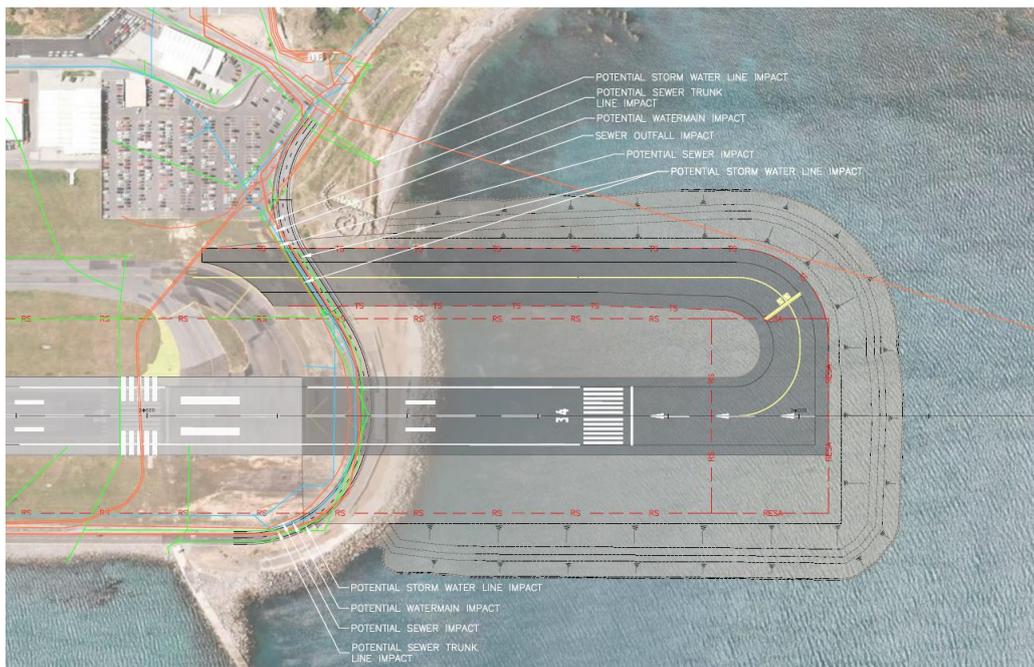


Figure 2 Drawing S5.0 of Vol II Technical Report 7

136. Figure 2 above illustrates how the Project may impact with those services in closest proximity to the subject site. The applicant has provided an assessment on utility services at Section 7.10 of the AEE.

137. In relation to the proposed network utilities that are potentially impacted on by the Project, the applicant has proposed that a Network Utilities Management Plan (NUMP) is developed prior to construction to ensure these services are located, and managed appropriately during the construction phase.

138. As the Project will cover the existing outfall from the Moa Point Wastewater Treatment Plant, consideration will need to be given to how this is managed. The applicant states in the effects on utility services assessment that testing undertaken as part of the geotechnical investigation provides for a number of possible options for protecting this outfall, with the final option being decided upon at the detailed design stage.
139. I am satisfied that the options for protecting network utilities and the Moa Point Wastewater Treatment Plant outfall can be appropriately managed at the detailed design stage. I also consider that the provision of a NUMP is an appropriate method to ensure that such matters are addressed, and accordingly I recommend this as a condition of consent. While certain higher value utilities have been identified, it should be broad enough to cover any other utilities that might be encountered.
140. Based on the above, I am satisfied the effects on network utilities will be acceptable.

Economic Effects

141. The Project, like many large infrastructure projects, will involve significant development costs and has the potential to generate significant economic benefits.
142. The applicant has provided a Cost Benefit Analysis (CBA) prepared by Sapere Research Group (Technical Report 4), and an Economic Impact Assessment (EIA) prepared by Ernst and Young (Technical Report 27). The CBA is the applicant's preferred method of economic analysis.
143. The CBA and EIA have been reviewed by economist Greg Akehurst, of Market Economics, who was engaged by WCC and GWRC to provide advice on the economic information submitted with the application. Mr Akehurst's report is included at Annexure 7.
144. Mr Akehurst considers that the EIA by Ernst and Young is of limited use due to the technical robustness of the report and therefore, he has not considered it in detail. This is addressed in his report.
145. In undertaking his assessment of the CBA undertaken by Sapere, Mr Akehurst agrees with the method used to assess the economic effects of the Project. After reviewing the CBA, Mr Akehurst agrees with most of the impacts estimated by Sapere. However, Mr Akehurst's estimates differ from the applicant's in the areas of lack of inclusion of sufficient optimism bias in the the construction cost estimates, the impact of landing charges, the value of travel time for leisure travellers, and calculating the costs of additional tourism infrastructure.
146. Mr Akehurst makes a number of adjustments to the numbers calculated by Sapere, and he reaches the following key conclusion:

At the national level, both the work carried out by Sapere and the assessment I have carried out (that relies on some more conservative assumptions) highlight a strong economic benefit to New Zealand with a Benefit Cost Ratio that ranges between 1.64 and 2.3, and a net economic benefit over 40 years in current discounted terms of between \$1.53bn and \$2.34bn.

By adjusting the input values and by refining the information used in the CBA, my opinion is that the net regional benefits estimated to accrue to Wellington region are \$465m. This is lower than Sapere's estimate, but still significant, especially in light of the employment sustained by the tourism flows.

147. Mr Akehurst considers that the Project will have a significant economic benefit at a national and regional level. The submission from the Board of Airline Representatives New Zealand (BARNZ, submission #688), includes evidence prepared by Ailevon Pacific (APAC) which concludes that the proposed InterVISTA passenger projections are overly optimistic and are unlikely to be realised. Mr Akehurst has considered this submission and notes that if the passenger projections are overstated, then the economic benefits described in the Sapere report will not materialise.
148. Based on the advice provided by Mr Akehurst, I am satisfied that the Project will result in significant economic benefits nationally and to the Wellington region. However, I note that these benefits are dependent on the passenger projections on which they are based being accurate.

SECTION 104(1)(B) ASSESSMENT

Higher Order Planning Documents

149. Relevant to the assessment of the Project is a hierarchy of planning instruments, each intended to give effect to the Purpose and Principles of the Act. In considering this application and the parts that relate to WCC's jurisdiction I have had regard to provisions of the following higher order planning documents:

National Planning Instruments

- The New Zealand Coastal Policy Statement (2010).
- National Environmental Standard for Air Quality 2004.

Regional Planning Instruments

- The Regional Policy Statement for the Wellington Region (2013).
- The Regional Coastal Plan for the Wellington Region (2000).
- The Regional Air Quality Management Plan (2000).
- The Regional Plan for Discharges to Land for the Wellington Region (1999).
- Proposed Natural Resources Plan for the Wellington Region ('PNRP').

District Planning Instruments

- The Wellington City District Plan (2000).

New Zealand Coastal Policy Statement (2010)

150. An assessment of the proposal against the relevant provisions of the New Zealand Coastal Policy Statement (NZCPS) has been completed by GWRC in its section 87F Report. I concur with the conclusions that have been reached and have nothing further to add in this regard.

The National Environmental Standard for Air Quality (2004)

151. The National Environmental Standard for Air Quality 2004 (NESAQ) introduced a number air quality standards to provide a minimum level of health protection. The NESAQ sets a number of technical standards for the monitoring of air quality and establishing air sheds.
152. GWRC has assessed the NESAQ and have higher levels of expertise in this field than WCC does. I defer to the conclusions in the GWRC report in this regard.

Regional Planning Instruments

Regional Policy Statement for the Wellington Region

153. An assessment of the proposal against the relevant provisions of the Regional Policy Statement (RPS) has been completed by GWRC in its section 87F Report. I concur with the conclusions reached by GWRC in this regard.

Regional Plans

154. An assessment of the proposal against the relevant provisions of the Regional Coastal Plan, Regional Air Quality Management Plan, Regional Plan for Discharges to Land and the Proposed Natural Resources Plan for the Wellington Region ('PNRP') has been completed by GWRC in its section 87F Report. I concur with the conclusions that have been reached and have nothing further to add in this regard, other than to note that Objective O13 and associated Policy O12 in the PNRP recognise and provide for the benefits of regionally significant infrastructure. This aligns with the District Plan insofar that Wellington International Airport is a key piece of transport infrastructure, and as such it is provided for as a special precinct in the District Plan.

District Planning Instruments

Wellington City District Plan

155. The majority of the proposed works are located in the 'Airport Area' and the 'Open Space B Area'. The application site extends into the sea, and is subject to Designations G2 and G3, as shown on District Plan Map 5. The Airport Area provisions are included at Chapter 10 (Objectives and Policies) and Chapter 11A (Airport Rules, Standards and Appendices). The Open Space Area provisions are included at Chapter 16 (Objectives and Policies) and Chapter 17 Rules, Standards and Appendices).
156. Ancillary works (such as the construction of the 2 compound sites) are on land zoned Business 1. The Business Area provisions are included at Chapter 33 (Objectives and Policies) and Chapter 34 (Rules, Standards and Appendices).
157. Objectives and policies relating to adjoining zones, such as Outer Residential) are also relevant given that some of the actual or potential effects of the Project will extend beyond the footprint of the application site.

158. In addition to the Airport and Open Space based provisions mentioned in the paragraph above, the proposal is also subject to provisions for certain activities which apply across all areas of the city, including: Earthworks under Chapter 29 (Objectives and Policies) and Chapter 30 (Rules), Heritage (Chapters 20 and 21) and Utilities (Chapters 22 and 23). All of these Chapters are fully operative.
159. As already noted above, the site is subject to the following District Plan notations:
- Hazard (Ground Shaking) Area (District Plan Map 5);
 - Principal Road, under the existing runway at Moa Point (Map 33);
 - Wellington Air Noise Boundary (Map 35)
 - Designation G2 – Airspace in the vicinity of Wellington International Airport (Maps 36-38)
 - Designation G3 – Runway End Safety Extension (RESA) – Southern End
 - Potentially Contaminated Sites within the Airport Area - Appendix 5, Chapter 11

Relevant Plan Changes

160. There are no active changes to the District Plan that are relevant to the Project.

Airport Area

Introduction

161. The application site is largely located within the Airport Area, in the Airport and Golf Course Recreation Precinct in the District Plan. The Introduction section of the Airport and Golf Course Recreation Precinct Objectives and Policies explains that (10.1):

'The Airport and Golf Course Recreation Precinct separates the activities of the Wellington Airport and the Miramar Golf Course into two distinct areas; the Airport area, and the Golf Course recreation area'

162. This section goes on to provide the following explanation:

'Wellington Airport is the country's air transport hub and busiest domestic airport. As a strategic transport node it plays an important role in providing for the social and economic wellbeing of the city, region and the nation. The Airport supports regular Trans-Tasman flights and, over time, is likely to serve longer-haul flights. Emerging changes to aircraft technology and the completion of the runway end safety areas will support these developments.'

The Plan provisions recognise the strategic importance of the Airport by providing for its continued use and development. The Plan provisions also provide for activities that are ancillary to this primary function. These activities include runways, taxiways, terminals, air carrier facilities, fuel storage, refuelling operations, and aircraft maintenance, as well as a number of support and commercial activities associated with an international airport.'

The Plan also contains provisions to manage non-airport activities and developments. This recognises that certain complementary activities can add to the attractiveness and vitality of the airport as a destination and departure point, as well as providing uses which benefit local communities. These activities will however be carefully managed to safeguard the ongoing operation of the Airport, to protect the character and amenity of adjacent landuses and to ensure retail activities do not affect the ongoing vitality and viability of the Kilbirnie and Miramar town centres.

Five different sub-areas have been identified in the policies in recognition of their unique character and potential for development. These policies will help guide development and be applied when assessing applications for resource consent.

These sub-areas are:

- *Terminal Area*
- *Rongotai Ridge*
- *Broadway Area*
- *South Coast Area*
- *West Side'*

Objectives and Policies Assessment

163. In assessing the proposal against the relevant Objectives and Policies of the District Plan, the assessment provided by the applicant provides a suitable starting point. The applicant has undertaken an assessment of the Project against the Objectives and Policies of the Airport and Golf Course Recreation Precinct, Open Space Area, and the Heritage, Utilities and Earthworks sections of the District Plan. The applicant has also provided an assessment of the proposal against the direction sought by the Residential Area and the Business Area objectives and policies.
164. Overall, I support the assessment undertaken by the applicant in assessing the objectives and policies of the District Plan relevant to the Project. As a starting point, I adopt the objectives and policies assessment as provided by the applicant, and will provide further discussion below of the objectives and policies that I consider key, or where my view differs from that of the applicant.
165. For simplicity, my objectives and policies assessment will follow the same order in which the applicant has undertaken its assessment - Airport and Golf Course Precinct (Chapter 10), Open Space Area (Chapter 16), Residential and Business Areas (Chapters 4 and 33), Heritage (Chapter 20), Utilities (Chapter 22) and Earthworks (29).
166. In addition to the applicant's assessment, I provide a brief assessment against the objectives and policies relating to designations (Chapter 24).

Airport and Golf Recreation Precinct

167. As detailed in the explanation above, and addressed in the applicant's assessment, the Airport and Golf Recreation Precinct provides for the continued operation of the Airport

with provisions to ensure that the effects of Airport operations are appropriately managed.

168. Of particular importance, Objective 10.2.5 and associated policies are relevant to the Project. This Objective and Policies are:

Objective 10.2.5 To protect the amenities of areas surrounding, and within, the Precinct from adverse environmental effects.

Policy 10.2.5.1 Exercise an appropriate level of control over Airport and ancillary activities for the avoidance or mitigation of adverse effects.

Policy 10.2.5.2 Ensure a reasonable protection of residential and school uses from Airport activities by providing controls on bulk and location, ensuring sufficient space is available for landscape design and screening, and by retaining a buffer of land of a recreational nature to the east of the Airport.

Policy 10.2.5.3 Control the interrelationship between building forms and the space around buildings to ensure a high level of visual amenity.

Policy 10.2.5.4 Manage the noise environment to maintain and where possible enhance community health and welfare.

169. This objective and associated policies seek to protect the amenity of surrounding areas from adverse effects of development and activities at the Airport. It is particularly relevant to this Project as a number of adverse effects on surrounding land-uses have been identified, particularly on those residents along Moa Point Road, and the properties identified on Kekerenga and Ahuriri Streets, which will be exposed to the bulk of construction noise, and for the residents of Moa Point Road who will experience the greatest level of visual effects.

170. In my opinion, the Project is not consistent with this objective and associated policies - particularly with respect to Policy 10.2.5.4. I accept that the applicant has proposed mitigation measures in the form of purchasing the affected properties, providing temporary re-housing during construction works, or providing acoustic insulation and mechanical ventilation. I also accept that these are really the only feasible options for mitigating the construction noise. However, these options rely on property owners accepting these options, and where this does not occur, the residents would be exposed to significant noise effects, which are likely to create sleep disturbance and/or impairment as well as being of general nuisance.

171. I concur with the applicant's assessment that the other relevant objectives and policies are Objective 10.2.1 and associated policies, Objective 10.2.4 and associated policies, and Objective 10.2.5 and associated policies. I do not consider the remaining objectives and policies relevant to this proposal. I also agree with the applicant's conclusions in relation to these objectives and policies and concur that the Project is not inconsistent with them.

Open Space

172. The Open Space zone covers a range of different open environments throughout Wellington City, is generally characterised by its lack of buildings (aside from in more active situations such as with the land containing the Wellington Regional Aquatic Centre), provides a visual distinction between built and unbuilt areas, and in many cases

has conservation values. In this case Open Space B land is affected by the Project. Part 16.3 of the District Plan describes this as:

'Open Space B land is valued for its natural character and informal open spaces. It involves areas that are used for types of recreation that, in the broadest sense, do not involve buildings or structures. The intention is to keep such areas in an unbuilt or natural state. This type of open space encompasses both formal and informal open space elements. It includes walkways, scenic areas and open grassed areas where buildings are inappropriate. Its characteristics are minimal structures, largely undeveloped areas and open expanses of land. Most Open Space B areas are vegetated and often have ecological values or may buffer Conservation Sites.'

173. Objective 16.5.1 and associated policy 16.5.1.1 are of relevance to the Project:

Objective 16.5.1 To maintain, protect and enhance the open spaces of Wellington City

Policy 16.5.1.1 Identify a range of open spaces and maintain their character, purpose and function, while enhancing their accessibility and usability.

174. The proposed reclamation will extend over a section of land that has been identified in the District Plan as Open Space B. In terms of natural character, Dr Steven has considered this matter in his assessment, and notes that while there will be a reduction in natural character in the Moa Point embayment area, it is able to be mitigated to ensure it remains at a moderate level (ie, it is maintained at the level it is now). Furthermore, the proposed public amenity improvement works adjoining Moa Point Road will improve pedestrian accessibility around the south coast, and enhance the recreational usability of these spaces. For these reasons, I consider the proposed development is consistent with this objective and policy.

Residential and Business

175. The application site is surrounded by a number of residential and business zones, being predominantly areas at Moa Point, Lyall Bay, and Strathmore Park that are predominantly in the Outer Residential Area, and the commercial areas at Lyall Bay that are Business Area 1. Some ancillary works (such as the construction of the 2 compound sites) are also to be undertaken on land zoned Business 1.

176. In assessing the proposal against these objectives and policies, the applicant has correctly identified that a number of the objectives and policies aim to maintain and protect the character and amenity of these areas and avoid, remedy or mitigate adverse effects.

177. While the proposed development does not occur in these areas as such (only some ancillary works), the development is likely to have an impact on surrounding areas in terms of traffic and noise. These noise and traffic issues have been assessed separately in this report. The Council experts are of the view that the effects can be appropriately managed. As already noted however in terms of noise, the proposed mitigation measures in the form of purchasing the affected properties, providing temporary re-housing during construction works, or providing acoustic insulation and mechanical ventilation rely on property owners or other occupants accepting these options. Where this does not occur, the residents are exposed to some significant noise effects. With respect to visual amenity, as outlined previously, the residents of Moa Point Road will experience the greatest level of visual amenity effects, which are unable

to be mitigated. For the Moa Point residents it is unlikely that these objectives and policies will be met.

178. There are a number of businesses areas in the nearby vicinity, predominantly those west of the current airport. Given the relatively large separation distances between the subject site and these business areas, and the reasons outlined in the effects assessment outlined above, it is not considered that the Project will be inconsistent with the objectives and policies of the business zones.

Heritage

179. The Heritage Chapters of the District Plan (Chapters 20 and 21) set out the objectives and policies and rule framework intended to protect the City's historic heritage from inappropriate use, development and subdivision. The Heritage provisions identify both the City's built heritage (buildings, objects, specific Areas, archaeological sites and their surroundings) and sites of significance to Maori.
180. The proposed Project and associated works will not physically affect any historic heritage features listed in the District Plan or sites of significance to Maori, and the Project is reasonably well set back from any heritage features. This has been confirmed in the assessment of Ms Tanner, who has provided a map identifying known heritage features (District Plan, Regional Plans, Archaeological Association and Heritage NZ) and where they are located in relation to the proposed works. As such, the Project does not require consent under any of the specific heritage rules contained within Chapter 21.
181. While the Project does not require consent under any heritage rules of the District Plan, I consider the following objective and policy still require due consideration:

Objective 20.2.1	To recognise the City's historic heritage and protect it from inappropriate subdivision use and development
<i>Policy 20.2.1.1</i>	Avoid, remedy or mitigate the adverse effects of development on the archaeological values of any site.

182. As outlined previously the applicant has provided an Archaeological Assessment, which has been reviewed by Ms Tanner for the Council. The review of this report by Ms Tanner states that despite the applicant providing a desktop analysis, there has been no marine archaeological survey undertaken to determine whether there is any archaeological evidence on the seabed. However, it is considered that subject to a marine archaeological survey condition being imposed, Ms Tanner concludes that the effects on historic heritage will be acceptable.
183. To the extent to which Objective 20.2.1 and Policy 20.2.1.1 are relevant, I consider that subject to the archaeological survey condition being imposed, that the proposal will be generally consistent with these provisions.

Earthworks

184. Under the 'Introduction' section to Chapter 29 of the District Plan, it is recorded that¹:

'Earthworks are essential to the development of the City. They create the areas of level land used for living, business and recreation, and the even gradients for paths and roads

¹ Page 29/1.

that enable people to get from place to place. They are integral to the construction of foundations and buildings. For all these reasons, and more, earthworks are part of many development projects in the City...

185. The objectives and policies under Chapter 29 of the District Plan recognise that earthworks are essential for Wellington's development, but such work needs to be appropriately managed to ensure the adverse effects of earthworks (including associated earthworks structures) can be avoided, remedied or mitigated as appropriate.
186. The applicant has assessed the proposal against Objective 29.2.1 and associated policies 29.2.1.4, 29.2.1.7, 29.2.1.8, 29.2.1.11, which I agree are relevant considerations for such a project. I generally concur with the assessment provided by the applicant, with the exceptions to this detailed below.
187. In addition to the objectives and policies identified by the applicant, I consider associated policies 29.2.1.1, 29.2.1.3, and 29.2.1.9 are also relevant to this application. I include these policies below, with a subsequent explanation:

Policy 29.2.1.1 Ensure that the design and assessment of earthworks and associated structures is coordinated with future land development and subdivision.

188. The proposed earthworks are required to provide the fill material of the proposed reclamation. While this policy is more aimed at land development, particularly green-field subdivision, the Project will ensure all earthworks are undertaken as part of a development.
189. To the extent to which this is relevant, I consider the proposed development is consistent with this policy.

Policy 29.2.1.3 Ensure that earthworks are designed to minimise the risk of instability.

190. The applicant has undertaken background investigation into the submarine ground conditions in the vicinity of the proposed reclamation for the purpose of ascertaining future engineering requirements. Prior to works commencing, the applicant will have to undertake significant engineering work as part of the detailed design to ensure the stability of the proposed structure. I am satisfied that if further details on earthworks stability is provided, or the applicant confirms that this can be appropriately addressed as part of the management plan process, the Project will be consistent with this policy.

Policy 29.2.1.8 Control earthworks in the Urban Coastal Edge, areas within the Ridgelines and Hilltops Overlay, Open Space B Areas Conservation Sites, Heritage Areas and on sites containing listed Heritage Items to protect the character, visual amenity or heritage value these areas provide to their immediate surrounds and the City.

191. The proposed development will involve earthworks occurring in the Open Space B Area at the southern end of the existing runway. As mentioned previously in this objectives and policies assessment, this area is heavily modified given it is part of the existing runway reclamation and generally offers little in terms of natural character. While the earthworks will have a notable visual effect during the filling stage, the effects on the Open Space B

area will be a small part of the overall works. Furthermore, earthworks will be limited to the construction period and will ultimately be covered by the proposed runway.

192. It is noted that the subject site does not include any area in the Urban Coastal Edge, which predominantly includes coastal residential properties.
193. As outlined in Ms Tanner's assessment, there are no heritage areas or sites affected by the proposed works.
194. I am satisfied that the proposal is consistent with this policy.

Policy 29.2.1.11 Ensure the transport of earth or construction fill material, to and from a site, is undertaken in a way that is safe and minimises adverse effects on surrounding amenity and the roading network.

195. Policy 29.2.1.11 is one of the key earthworks policies given the scale of fill material to be transported to the application site. While the applicant has acknowledged that the exact source and subsequent haulage of the fill is yet to be determined, it has requested an assessment of the Project from a 'worst case' scenario, where all fill is transported to the site via the existing roading network.
196. In assessing the proposal against this policy, the explanatory notes provide further guidance as to what this policy is seeking to achieve in terms of managing the effects of transporting earth or fill material:

Larger earthworks projects can cause problems with transport on city streets. Taking material from a site, or bringing it to a site from elsewhere, can adversely affect safety on footpaths and roads and cause congestion. Noise from trucks can also affect the amenity of properties within the vicinity of the work being undertaken and along the route chosen to transport the material.

In some instances material will be removed from one site and transported as fill to another site. In these situations it may be necessary to assess the transport effects for both sites, either together or under separate resource consent applications. In order to minimise the adverse effects of moving material it may be necessary to place conditions which define the route, hours of trucking and any other matters that could mitigate the effects.

When assessing an application for resource consent the following matters should be taken into consideration:

- *The extent to which the transport of material to or from the site will affect the amenity of surrounding areas having regard to:*
 - *the type of truck being used*
 - *the frequency, timing and duration of truck movements*
 - *the proposed route. The use of Collector, Principal and Arterial Roads and the Motorway, over local roads is preferred*
 - *the width, sightlines and other characteristics of the streets along the route*
 - *the presence of sensitive land uses along the route e.g. schools*

- *whether the proposal requires the closure of any streets*
- *Whether the location of the access to the site under consideration can be sited safely. Measures may be necessary to allow traffic, cyclists and pedestrians to move safely past the site*
- *The need for a traffic management plan (as part of a wider earthworks and construction plan) detailing the above matters and how they will be managed, including any procedures for receiving and responding to complaints.*

The environmental result will be that earthwork material is transported in a way that is safe and does not detract significantly from the amenity of an area.

197. These explanatory notes provide a clear explanation as to how transportation of earth and/or fill material is to be managed for large earthworks projects.
198. The applicant has acknowledged that transporting such a large volume of fill will have an effect on the road transport network, and accordingly, has proposed a number of measures to mitigate these effects. These are detailed in the AEE and associated Traffic Assessment (including additional information supplied), with the primary measures including limiting haulage to off-peak periods which avoids commuter and school traffic times, avoiding any haulage during weekends, and primarily utilising the State Highway network where possible.
199. In addition to the measures proposed by the applicant, I consider that it is appropriate for construction traffic movements to be managed in accordance with the final Construction Traffic Management Plan to be supplied to, and approved by WCC, as a condition of consent. This will ensure appropriate traffic management methods are applied to the finalised traffic solution. I also consider that the proposed condition related to haulage should potentially be extended to include public holidays as the effects during those periods would often be consistent to those occurring during the weekends. This is a matter which I consider requires further consideration by the applicant.
200. Regardless of the concern expressed above regarding public holidays, I am satisfied that with conditions, the proposal is consistent with this policy.
201. In summary, and considering the matters above and the recommended conditions of consent, I consider that the proposal will be consistent with Objective 29.2.1 and the relevant corresponding policies.

Utilities

202. The Utilities Chapter of the District Plan (Chapter 22) recognises the importance of utilities for providing communications, distributing energy, water reticulation and sewage and stormwater drainage. The District Plan sets out the provisions for managing utilities in Wellington City.
203. The purpose of such the Utilities Chapter is to recognise and provide for and protect essential services and land-uses. This chapter includes the following objective and associated policies:

Objective 22.2.1 To provide for the efficient development and maintenance of utility networks [and the activities of

other utility operators]PC74 throughout the city while avoiding, remedying or mitigating any adverse effects of activities on the environment.

- Policy 22.2.1.1 Avoid, remedy or mitigate any adverse environmental effects of utility networks by requiring resource consents for structures and activities with a significant impact [or where they are proposed to be located in sensitive and/or highly valued environments]PC74.
- Policy 22.2.1.1A In respect of telecommunication structures, encourage the co-location of antennas on masts to reduce the need for new masts elsewhere in the city; whilst recognising the technical constraints associated with co-location and that the benefits of co-location may be outweighed by the additional visual effects associated with several antennas on one mast.
- Policy 22.2.1.1B To recognise reserve land values (typically zoned as either Open Space or as Conservation Sites) in the siting of utilities. Some utilities may be appropriate on Open Space A land as this land typically contains buildings and/or structures which can be used to mitigate the effects of utilities. On Open Space B and C land and Conservation Sites, utilities are generally discouraged but may be appropriate, where there are no reasonable siting alternatives and where adverse visual effects can be appropriately mitigated, in particular for those utilities associated with the operation of legal roads.]PC74
- Policy 22.2.1.2 Have regard to the operational requirements of utility networks when exercising discretion in any resource consent process.
- Policy 22.2.1.3 Encourage utility networks to be sited underground [(except for aerials, antennas, masts, utility network apparatus and utility structures, which need to be sited above ground to achieve their function).]2
- Policy 22.2.1.4 Encourage existing overhead line networks to be relocated underground.
- Policy 22.2.1.5 To ensure that utility structures that are critical facilities are not at risk from hazards.

204. The Project will impact on a number of established utilities as part of the construction programme, which is likely to involve relocation, or replacement of reticulated services.

205. In most instances, these utilities are already established underground reticulated services and the proposed works will only require reinstatement of those already existing. The operational requirements of such infrastructure, including its ongoing

operation during the construction period, is something that can be worked through during the pre-construction detailed design stage. I note that agreement with network operators must be obtained prior to commencing any works that may affect such infrastructure.

206. Some of the existing utilities are located within, or in close proximity to, the Open Space B Area. While such utilities may be relocated in this area, these are generally located underground and occur on a section of the Open Space B Area that is generally characterised by airport and roading activities.
207. To the extent to which Objective 22.2.1 and associated policies are relevant, I consider that the proposal will be generally consistent with these provisions.

OVERALL SUMMARY OF DISTRICT PLAN PROVISIONS

208. Having considered the relevant objectives and policies within the Airport Area, Open Space, Residential, Business, Heritage, Earthworks, and Utilities, I consider that the proposal will be generally consistent with the strategic direction of these provisions, with the exception of the provisions with respect to noise and visual amenity.

SECTION 104(1)(C) OTHER MATTERS

Wellington South Coast Management Plan (2002)

209. The South Coast Management Plan (SCMP) was adopted by WCC in 2002, and manages land classified as reserve along the South Coast. While it is a non-statutory document, it remains important in setting out the vision, values and principles that guide the development of along the South Coast.

210. The purpose of the SCMP is:

The role of a management plan is to direct or manage the use of land classified as reserve under the Reserves Act 1977. The objective of a management plan is to establish guidance for day-to-day management and decision-making, and to establish the desired mix of values and uses for reserve land.

211. The SCMP sets an 'area based' approach to managing the South Coast, and sets out a number of Management Policies for achieving the objectives of the SCMP. The primary and secondary objectives are set out as follows:

Primary Objective:

- *To protect and enhance the coastal character of Wellington's South Coast.*

Secondary Objectives:

- *To enhance and, where possible, restore the natural values of the coast, while providing for the recreational and leisure desires of visitors/users.*
- *To reduce conflict between the many users and values of the area.*

- *To respect, acknowledge and protect the history, heritage and diverse character that the South Coast holds for iwi and Wellington's communities.*
- *To meet the needs of coastal visitors/users and the City, while ensuring any infrastructure or facilities are developed in sympathy with the coastal environment.*
- *To manage the coast as a public asset with the assistance of the community in conjunction with our Treaty partners (in accordance with the memoranda of understanding held with the Council).*

212. With respect to these objectives, the SCMP outlines how these objectives are to be considered:

These objectives must be taken together and not used as isolated statements. However, in particular circumstances, certain objectives may have more relevance. Actions that promote more than one objective will generally have a higher priority than those that serve single objectives.

213. There are several sections of land surrounding the existing runway which will be affected by the proposed development. These land parcels are listed as Local Purpose (esplanade) reserve under the Reserves Act 1977.

214. The SCMP identifies the area around Moa Point, in close proximity to the airport, as Site Reference B3 (page 27 of the SCMP), and categorises this area of the South Coast as follows:

The key function of this area of land is to provide erosion protection – predominantly for the coastal road and airport. Equipment for the operation of the airport is permitted in this area, as are operations to maintain the seawalls in this high impact coastal environment.

The area is also important for recreational access and has an established beach to the south which has a natural character.

215. The SCMP identifies that the reserve land around the Moa Point area is characterised by the airport runway and associated reclamation and sea walls, and provides for the ongoing operations of the airport.

216. In evaluating the proposal against the primary and secondary objectives of the plan, it is considered that the proposed development will affect an area of the South Coast that is already highly modified, and recognised as being ancillary to airport operations.

217. While the area is also important for recreational access, the Project will not result in further access restrictions, with the exception of temporary construction restrictions in some areas. Existing access areas will also be maintained and enhanced through recreational amenity improvements at Moa Point and along Moa Point Road.

218. The area of reserve at Moa Point beach is recognised as having natural character, and as outlined by Dr Steven, there will be a reduction in natural character in this area. Further mitigation is required to ensure natural character is maintained.

219. For these reasons, and taking into account that the reserve areas are recognised for their relevance to airport operations, it is considered the proposal is aligned with the primary and secondary objectives for this area.
220. I note that at this stage, the applicant has not yet commenced the reserve revocation process under the Reserves Act 1977. This is a separate process, independent to consenting processes under the RMA.

Overall, it is my view the Project is aligned with SCMP vision for this area

Wellington Towards 2040: Smart Capital (2013)

221. *Wellington Towards 2040* is a non-statutory document that sets out the Council's policy direction for the future development of the City over the next 30 years. It is based on Council's 'holistic' aspirations for Wellington and an understanding of the challenges and opportunities facing the City. As a 'vision' document, it provides the overarching framework that future decision making and resource allocation will be assessed under for the Council's future activities.
222. This strategy document is supported by four city goals and sets out the pathway for Wellington's future, being based on becoming:
- A People-Centred City
 - A Eco City
 - A Connected City
 - A Dynamic Central City.
223. In terms of Wellington becoming a 'connected city', the strategy identifies '*effective and efficient regional, national and international infrastructure*' (pg 20) as a key factor that ensures the ease of transporting people and goods. The strategy goes on to elaborate the following:
- 'Understand, advocate for, and facilitate the existing and future infrastructure needs of Wellington and beyond – immediate priorities include long-haul airport capability and the ultra-fast and rural broadband initiatives.'*
224. As outlined throughout the application documents and associated reports, the current runway length limits long-haul planes from using Wellington International Airport. The proposed runway extension will provide for larger planes, which in turn will realise opportunities for long-haul travel.
225. Based on this, it is my view that the proposed development is consistent with the 'Connected City' goal of *Wellington Towards 2040*.

Public Spaces Design Policy (2008)

226. The Public Spaces Design Policy recognises that²:

'Public spaces are where many of the key events of urban living take place, including: movement (by foot, car, bus or bike – moving people, goods and information); gatherings (events, concerts, games, political and civic functions); recreation (eating, coffee drinking, promenading, picnicking, skateboarding, window shopping); and other encounters of urban nature. Every type of public space has its own specific characteristics and function.

The quality of Wellington's public open spaces is critical to the economic, environmental and cultural success of the city. Public open spaces contribute to the core function of a city by enabling a wide range of activities to occur'.

227. The Public Spaces Design Policy incorporates a total of 8 objectives and several corresponding policies which seek to give direction to both Council and those professionals engaged by Council, in how Wellington's public spaces are initiated, designed, delivered and managed holistically. The relevant objectives are as follows:

Objective 1: To enhance Wellington's sense of place.

Objective 2: To make the structure of Wellington better understood as a city.

Objective 3: To improve accessibility for all.

Objective 4: To improve the diversity of experience for Wellingtonians and visitors.

Objective 5: To enhance the city's night-time environment.

Objective 6: To ensure the design of public spaces incorporates elements of sustainability.

Objective 7: To ensure that public spaces incorporate high-quality design.

Objective 8: To manage and maintain public spaces effectively.

228. The Project includes proposed recreational amenity improvements along Moa Point and along the Lyall Bay edge of Moa Point Road. Indicative design concepts have been provided as part of the application, but final plans will be developed at the detailed design phase.

229. The Council will have input into these plans, both as a landowner and as a regulatory authority (i.e. through certifying consent conditions) and will be able to ensure these objectives are met.

230. Overall, I consider the proposal is consistent with this policy.

² Public Spaces Design Policy, pg 2.

Climate Change Action Plan (2013)

231. Wellington City Council *Climate Change Action Plan (2013)* is a non-statutory document that represents the Council's commitment to the reduction of greenhouse gases and planning for the effects of climate change (pg 7). Although the focus of the Climate Change Action Plan is on 'longer-term' objectives for Wellington city, it also focuses on measures that can be achieved between 2013-15.
232. While the report recognises that the aviation sector is a notable contributor to greenhouse gas emissions, being 18% of the total of Wellington's greenhouse gas emissions, it is recognised that the Council has minimal control over this mode of transport and its associated emissions.
233. This report specifically refers to Council's role in facilitating the runway extension project as one of the *Priorities: 2013-2015* (pg 39), and that the Council will '*...work with the airport to assess the climate change impacts of the runway extension and identify mitigation opportunities*'. The application does not specifically outline the extent to which the airport and the Council have been working together to achieve this. However, the Climate Change Action Plan also identifies that larger and more efficient aircraft, requiring a longer runway, will reduce overall aircraft emissions on a per-passenger basis.
234. While increased aviation will ultimately result in increased greenhouse gas emissions, I note that this Plan does envisage the runway extension project (or at least the planning stages) proceeding.
235. In this case, I consider that the proposal is not inconsistent with the Climate Change Action Plan 2013.

WCC Heritage Policy (2010)

236. The WCC Heritage Policy is described as the 'background statement' which sets out the intent for the Council to carry out its responsibilities required by legislation, including its obligations under the Resource Management Act 1991. The policy is intended to provide a focused direction for the management and identification of Historic Heritage for the future.
237. WCC Heritage Policy recognises that the protection and use of the City's historic heritage resources are fundamental to the sustainable management of Wellington's natural and physical resources and seeks to align its definition and interpretation of the historic heritage with that of the Resource Management Act. The policy provides direction for the Council in exercising its broad range of functions in terms of heritage management in a way which is consistent with the Act.
238. I consider that the proposal is not inconsistent with the WCC Heritage Policy (2010) for reasons stated earlier in this report.

Port Nicholson Block (Taranaki Whanui ki Te Upoko o Te Ika) Claims Settlement Act 2009 and Ngati Toa Rangatira Claims Settlement Act 2014

239. The Wellington Harbour and the Coastal marine area (which includes the South Coast) are statutory acknowledgement areas under the Port Nicholson Block (Taranaki Whanui ki Te Upoko o Te Ika) Claims Settlement Act 2009 (Port Nicholson Act).
240. The Wellington Harbour and Cook Strait are statutory acknowledgement areas in the Ngati Toa Rangatira Claims Settlement Act 2014 (Ngati Toa Act).
241. These statutory acknowledgement areas are adjacent to and in the vicinity of the application site.
242. These Acts requires information relating to all resource consent applications that are received by the Council that are within, adjacent to, or that will directly affect a statutory acknowledgement area, to be provided to trustee of the Toa Rangatira Trust and the Trustees of the Port Nicholson Block Settlement Trust (the Trustees). This information should be provided to the Trustees before a notification decision is made by the Council (section 29 of the Port Nicholson Act, and section 31 of the Ngati Toa Act).
243. Section 25 of the Port Nicholson Act and section 27 of the Ngati Toa Act require the Council to consider whether the Trustees are persons who may be adversely affected if the activity is within, adjacent to, or directly affects a statutory area, when making a decision as to notification under the RMA. Separate to this requirement, the RMA requires the Council to 'have regard to' the statutory acknowledgements when deciding whether the Trustees are an 'affected person' for the purposes of notification.
244. In this case, public notification was requested by the applicant under section 95A of the RMA and public notice was served directly on the Port Nicholson Block Settlement Trust and Te Runanga o Toa Rangatira Inc.
245. I note that as part of the application, the applicant has provided a Cultural Values Report and Cultural Impact Report, both prepared by Raukura Consultants.

Road Encroachment and Sale Policy (2011)

246. As often anticipated by projects of this size, it is possible that the project may include certain works that may extend onto, or over, legal road. Details of such works (if any) will become more apparent following detailed design, and once construction details and methodology are established with key contractors.
247. The applicant must apply to the Council as landowner of the road under the Road Encroachment and Sale Policy (and the Public Places Bylaw) for either an Encroachment Licence to occupy or use legal road for exclusive private purposes. This process is independent from the resource consent process.

SECTION 8 - PART 2 OF THE ACT – ASSESSMENT AGAINST SECTIONS 5, 6, 7 & 8

248. Consideration of an application under section 104 of the Act is subject to Part 2 (sections 5, 6, 7 and 8) of the Act. Part 2 sets out the purpose and principles of the Act. 'Subject to'

gives primacy to Part 2 and is a primary consideration when applying the provisions of the Act.

249. In achieving the purpose of the Act, Part 2 requires the consent authority to recognise and provide for matters of national importance (section 6); have particular regard to other matters (section 7); and to take into account the principles of the Treaty of Waitangi (section 8).

Section 5: Purpose

250. The purpose of the Act is stated in section 5 - '*to promote the sustainable management of natural and physical resources*'. Section 5(2) goes on to state that 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 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.'*

Section 6: Matters of National Importance

251. In relation to managing the use, development, and protection of natural and physical resources, Section 6 sets out the matters of national importance which are to be recognised and provided for in relation to all decisions under the Act, including this resource consent application. I consider that the following provisions of section 6 are relevant and provide my view and reasoning on each of these provisions accordingly.

(a) the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development

252. The Project location is at the end of the modified coastal environment at the southern end of the existing runway breakwater. The effects on the natural character of ecosystems have been addressed by GWRC in relation to section 6(a), based on the advice provided by Dr Steven. I concur with the conclusions of the GWRC report in this regard and also find that the proposal is consistent with section 6(a) of the Act.

(d) the maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers

253. The coastal marine area around Lyall Bay and Moa Point road are popular areas that are valued for numerous recreational activities. In terms of public access above the MHWS, this will largely be maintained with exception of some access restrictions during the construction phase.

254. A number of recreational amenity improvements are proposed, which will enhance access along areas of the south coast, including Moa Point Road adjoining Lyall Bay. Additionally, public access may be formed alongside the proposed runway, providing public safety can be maintained.
255. Overall, I consider that public access above the MHWS mark will be maintained or enhanced.
- (e) the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga*
256. Recognition of the significance of the coastal marine area in the Project reclamation area and the immediate surrounds has been provided for through the consultation with relevant tangata whenua and the statutory acknowledgement of the coastal marine area and Cook Strait.
257. Based on the information outlined in the cultural values report and cultural impact report, the adverse effects on the relationship between Maori and their ancestral lands, water, known sites and waahi tapu and other taonga will be limited and the proposed conditions of consent will continue to provide for this relationship.
- (f) the protection of historic heritage from inappropriate subdivision, use, and development*
258. There are no known heritage items directly affected by the Project. Particular regard has been had to the protection of historic heritage from inappropriate use and development. The effects resulting from the works within the application site are not considered by Ms Tanner to be inappropriate. The conditions which require an Archaeological Discovery Protocol for land based works and a full marine archaeological assessment will ensure the identification and recording of any unknown archaeological sites and material potentially affected by the process.

Section 7: Other Matters

259. Section 7 includes matters that the consent authority shall have particular regard to in relation to all decisions under the Act, including this resource consent application. I consider that the following provisions of section 7 are relevant and provide my view and reasoning on each of these provisions accordingly.
- (a) Kaitiakitanga*
- (aa) The ethic of stewardship*
260. As part of the proposal, the applicant has consulted with the Port Nicholson Block Settlement Trust and Te Rununga O Toa Rangatira.
261. Te Rununga O Toa Rangatira has submitted on the proposal, raising a number of matters that have subsequently been addressed through the proposed consent conditions. Port Nicholson Block Settlement Trust has not submitted on the application.
262. Overall, it is considered that Tangata Whenua will be able to continue their Kaitiaki relationship with the site and surrounds, and the ethic of stewardship will be maintained,

particularly with the MOU in place that the applicant has committed to with the relevant iwi authorities.

(b) The efficient use and development of natural and physical resources

263. The Project provides for the efficient use and development of natural and physical resources in that it provides for the future expansion of an existing key piece of strategic infrastructure, avoiding the need to develop a future new airport facility.
264. Furthermore, the proposal represents efficient use and development of natural resources in the sense that the runway extension will provide for long haul flights to and from a number of destinations, avoiding connecting internal flights before departing New Zealand. This will possibly result in more efficient air transport options.

(c) The maintenance and enhancement of amenity values

265. 'Amenity values' is defined under section 2 of the Act as *'those natural or physical qualities or characteristics of an area that contribute to people's appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes'*.
266. I acknowledge that the construction of the Project will result in a range of amenity effects above the MHWS. These include temporary construction amenity effects, and permanent effects on visual amenity in the Moa Point area. In particular:
- Construction effects will cause disruption, particularly with respect to night-time construction noise, but most of these effects can be mitigated (or all can be, if owners agree to the proposed mitigation measures in terms of construction noise on Moa Point Road, Ahuriri and Kekerenga Streets).
 - Permanent visual amenity effects on those residents at Moa Point, which are more than minor, and unable to be mitigated.
267. In terms of positive public amenity effects, there will be improvements around Moa Point and Moa Point Road, which will result in positive amenity effects.
268. Overall, it is considered that the proposed development will not maintain or enhance amenity values.

(d) The intrinsic values of ecosystems

269. The effects on the 'intrinsic value' of ecosystems have been addressed in greater detail by the report prepared by GWRC in relation to Section 7(d). I defer to their conclusions in this regard that the proposal is consistent with section 7(d) of the Act.

(f) The maintenance and enhancement of the quality of the environment

270. I note that under the Act, 'environment' is broadly defined to include (a) ecosystems and their constituent parts (including people and communities), (b) all natural and physical resources and (c) amenity values. 'Environment' also includes the social, economic, aesthetic and cultural conditions which affect matters (a) to (c) or which are affected by those matters.

271. The effects on the environment occurring within CMA have been assessed by GWRC, and accordingly I defer to their conclusions in this regard.
272. As already outlined in this report, there are a number of aspects of the environment that will not be maintained or enhanced, which from a WCC jurisdiction perspective primarily relate to construction noise and visual amenity on Moa Point Residents, which cannot be fully mitigated. In most other cases, environmental effects can be mitigated to a point where they are acceptable and there are other areas where amenity improvements will result in an overall environmental enhancement. In terms of the economic aspect of the environment, it is clear from Mr Akehurst's advice that there will be a significant economic benefit both nationally and regionally.
273. In considering all aspects of the environment, I am of a view that overall, the quality of the environment will be maintained.

(g) The finite characteristics of natural and physical resources

274. It is acknowledged that the proposed development will affect the coastline and coastal marine area, which are both finite natural and physical resources. However, the proposed reclamation will cover a relatively small area of the wider Lyall Bay coastal area, and the section of coastline affected by the runway is predominantly a modified area of coastline.
275. Overall I consider the proposed development will have regard to the finite characteristics of natural and physical resources.

(i) The effects of climate change

276. The effects of climate change have been addressed in greater detail by the report prepared by GWRC in relation to the effects of natural hazards and sea level rise. I defer to their conclusions in this regard.

Section 8: Treaty of Waitangi

277. Section 8 states that all persons exercising functions and powers under the Act shall take into account the principles of the Treaty of Waitangi. The Treaty and its principles are an important part of the cultural and constitutional identity of New Zealand. Treaty principles interpret the Treaty as a whole, its underlying meaning, intention and spirit to provide further understanding of the expectations of the signatories.
278. The applicant has consulted with the relevant Tangata Whenua and cultural issues have been considered as part of this application. Te Runanga o Toa Rangatira Incorporated have submitted on the Project, outlining a neutral view but requesting specific conditions of consent are imposed. I consider that with the recommended conditions of consent, along with the proposed Memorandum of Understanding, that ongoing participation by iwi groups will be maintained.
279. Based on this, the proposal is not inconsistent with the principles of the Treaty of Waitangi in my opinion.

Part 2 of the Act - Conclusion

280. Drawing from the conclusions of this report, I consider that the proposed development will be consistent with the purpose of the Act (Section 5), and Part 2 more generally. Specifically, the Project will promote the sustainable management of natural and physical resources as the increased runway length will provide for direct long-haul flights to a range of international destinations in a location where an airport is already established. These potential new flight options and the significant economic benefit predicted for the Wellington and national economy will enable people and communities to provide for their social, economic and cultural well-being.
281. There are adverse effects on the environment, which are definable, and in most cases are able to be mitigated (or are for a limited period during construction). I do not consider that the magnitude of such effects is unanticipated in the broader context of such a large infrastructure project. Furthermore, I note that the adverse effects which cannot be mitigated, being the visual amenity effects on Moa Point Residents (and potentially night construction noise) should be viewed against the wider economic benefits. Overall, I consider these adverse effects do not outweigh the benefits that are identified in this report.
282. The outstanding matters relevant to WCC are as follows:

Proposed Noise Mitigation Measures

- Mitigation measures for construction noise that involve either re-housing residents or installing acoustic insulation and mechanical ventilation will require approval of the landowners and/or occupiers. It is necessary to ascertain whether this form of mitigation is likely to be acceptable, and there would be value in the applicant exploring this with affected residents.

Traffic

- An alternative route needs to be developed and assessed for appropriateness, to be used if the proposed route is unavailable.
- The swept path diagrams and details for the Basin Reserve area are required and have been asked for but not provided to date. These diagrams may change the acceptability of the haulage route

Natural hazards

- The engineering design of the airport extension needs to be assessed to demonstrate that its structural integrity can withstand a seismic event. I consider that this can be addressed prior to the hearing, or in the management plan prior to works commencing.

Landscape and visual effects

- Further landscape design detail and ecological restoration initiatives are required to mitigate the adverse impacts on landscape and visual amenity in Lyall Bay east.
- A Moa Point natural character mitigation & restoration plan that addresses natural elements, natural patterns and natural processes, and in a coordinated way to maintain natural character post construction of the runway at Moa Point is required.

Approval for amenity improvements on WCC land

- The applicant has presented Memorandum of Understanding to WCC for its consideration with respect to the proposed recreational amenity improvements at Moa Point and along Moa Point Road. While these structures would be situated on Council land and managed by agreement between the Council and WIAL, it would be valuable to finalise such approval. This will ensure the benefits of such works can be realised.

283. Subject to a satisfactory outcome in relation to these matters, I am satisfied that the Project will promote the sustainable management of natural resources in accordance with the purpose of the Act, and in accordance with Part 2 of the Act more generally.

FINAL CONCLUSION

284. In summary, a number of uncertainties and information gaps have been identified with respect to the effects of the proposal (as outlined above). However, provided these critical matters are satisfactorily addressed I consider that adverse effects can be appropriately remedied or mitigated (or can be balanced against the significant economic benefits), that the proposal is generally consistent with the direction in the relevant statutory planning documents and non-statutory documents, and that the proposal will promote the sustainable management of natural and physical resources in accordance with the purpose of the Act. In my view, consent could be granted for the consents sought from WCC, if the outstanding matters and issues are addressed and they raise no new issues.

PROPOSED CONDITIONS

285. Should the consent be granted, I have included a set of recommended conditions at Annexure 8 of this report. These conditions have been developed in conjunction with GWRC, and are identical to that outlined in the S87F report for GWRC.