

SECTION 32 REPORT

Airport Zone

May 2022

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1 Executive Summary

The Far North District (**District**) supports three commercial airports; located in Kaitāia, Kaikohe and Kerikeri (with Kerikeri referred to as the Bay of Islands Airport).

The Far North District Council (**Council**) has responsibilities under the Resource Management Act 1991 (**RMA**) and the Regional Policy Statement for Northland (**RPS**) to protect regionally significant infrastructure which through its use significantly enhances the District's economic, cultural, environmental and social wellbeing. The Kaitāia and Bay of Islands Airports are recognised as regionally significant infrastructure.

Whilst the Kaikohe Airport is not currently identified as regionally significant infrastructure because it is an aerodrome and does not operate commercial flights, given its location and size it is important for the District's long-term strategic planning to protect and provide for its future development as regionally significant infrastructure. Therefore, the Kaikohe Airport has been included in the Airport zone to ensure that it can be flexible, adaptable, and resilient, and support future regional economic development and community wellbeing.

The management approach in the Proposed Far North District Plan (**PDP**) for the 'Airport zone' chapter includes provisions as follows:

- Creating an Airport zone to give effect to higher order planning documents, including the requirement to protect regionally significant infrastructure.
- Provisions that align with the 'hybrid approach' of the PDP that focuses more on activity-based rules compared to the effects-based approach in the Operative District Plan (**ODP**).
- Manage 'Airport protection surfaces' to facilitate the continued operation of airport activities whilst avoiding the adverse effects of activities that could restrict future opportunities for airport operations and expansion.
- Enable airport activity, general aviation activity, and airport retail and commercial activities where they are located outside of the 'Airport protection surfaces'.
- Noise sensitive activities are not provided for in the Airport zone to avoid adverse reverse sensitivity effects.
- Standards to manage the bulk and location of buildings and structures to ensure that the potential effects of built form within the zone do not adversely affect the amenity values and character of the surrounding locality. Including standards for:
 - Maximum height
 - Airport protection surfaces
 - Height in relation to boundary
 - Setback from boundaries
 - Outdoor storage
 - Coverage
- Where compliance cannot be achieved with the permitted activity rules or standards, resource consent is required either as a discretionary or non-complying activity.

2 Introduction and Purpose

2.1 Purpose of report

This report provides a summary of the evaluation undertaken by the Council in preparation of district plan provisions for the Airport zone in the **PDP**. This assessment is required under section 32 of the RMA.

Section 32 of the RMA requires Councils to examine whether the proposed objectives are the most appropriate to achieve the purpose of the RMA and whether the provisions (i.e. policies, rules and standards) are the most appropriate way to achieve the objectives. This assessment must identify and assess environmental, economic, social, and cultural effects, benefits and costs anticipated from the implementation of the provisions. Section 32 evaluations represent an on-going process in RMA plan development and a further evaluation under section 32AA of the RMA is expected throughout the review process in response to submissions received following notification of the PDP.

This report sets out the issues for the Airport Zone, and it provides an overview of the statutory and policy context, and any specific consultation. The report also includes a review of the ODP and evaluation of alternatives to determine the most appropriate way(s) to achieve the purpose of the RMA in relation to the Airport zone.

2.2 Overview of topic

The District supports three commercial airports; located in Kaitāia, Kaikohe and Kerikeri (with Kerikeri referred to as the Bay of Islands Airport). Of these, only the Kaitāia and Bay of Islands Airports currently operate commercial flights. The Bay of Islands Airport is the only airport that is designated as per the designations section in Part 3 – Area specific matters of the PDP, being designation FH201. There have been no requests to designate Kaitāia or Kaikohe Airports.

Far North Holdings Ltd (**FNHL**) is the commercial trading and asset management arm of Council that manages the airports.

The Council has responsibilities under the RMA and the RPS to protect regionally significant infrastructure which through its use significantly enhances the District's economic, cultural, environmental and social wellbeing. The Kaitāia and Bay of Islands Airports support multiple economic benefits such as tourism, movement of goods and services, and domestic and international travel, providing for the District's social wellbeing. These Airports are therefore recognised as regionally significant infrastructure.

The operations of the Kaitāia and Bay of Islands Airports need to be protected from land use and subdivision that could potentially become subject to reverse sensitivity issues or land sterilisation making it difficult for airport operations to continue or expand. The Airport zone applies to the Kaitāia and Bay of Islands Airports to ensure that their operations are protected from disruption from other activities.

Whilst the Kaikohe Airport is not currently identified as regionally significant infrastructure because it does not operate commercial flights and operates as an aerodrome, given its location and size it is important for the District's long-term strategic planning to protect and provide for its future development as regionally significant infrastructure. Therefore, the Kaikohe Airport has been included in the Airport zone to ensure that it can be flexible, adaptable, and resilient, and support future regional economic development and community wellbeing.

To facilitate the protection of airport operations from inappropriate subdivision, use and development there is a need to understand the context of airport management and the relevance of Treaty settlements that may influence airport operations. This is critical to ensure the efficient and effective management of the Airport zone to avoid potential land sterilisation or reverse sensitivity issues that could restrict future opportunities for airport operations and expansion.

Council needs to ensure that regulatory intervention appropriately protects airport functions whilst providing provisions that enable other activities within the zone that support the functional needs of airport activities, such as car rental services

The changes in provisions pertaining to the Airport zone chapter are part of a consolidated review of the ODP. The provisions proposed in this assessment have modified the existing provisions in the ODP to ensure appropriate protection measures are established for all three airports (Kaitiāia, Kaikohe and Bay of Islands).

The 'Airport buffer areas' in the ODP have been revised and rationalised based on future operating scenarios out to 2040, and the PDP includes an 'Air noise boundary' and an 'Outer control boundary' around Kaitiāia and Bay of Islands Airports. The standards for noise insulation for noise sensitive activities are included in the Noise chapter in Part 2 – District wide matters of the PDP. (There is a separate Section 32 report for the Noise chapter.) Currently, the Kaikohe Airport is utilised by the local Aerodrome Club with comparatively low aircraft noise emissions and aircraft traffic when compared with Kaitiāia and Bay of Islands Airports. The Kaikohe Airport noise emissions have not been modelled and therefore the DPD does not incorporate noise contours or restrictions to manage the development of sensitive activities.

As per the ODP, there are also airport protection surface rules which comprise 'planes' in the airspace around the Kaitiāia, Kaikohe and Bay of Islands Airports and extend into adjacent zones. These zones include rules to manage land use within the airspace.

3 Statutory and Policy Context

3.1 Resource Management Act 1991

The **Section 32 Overview Report** for the PDP provides a summary of the relevant statutory requirements in the RMA. This section provides a summary of the matters in Part 2 of the RMA (purpose and principles) of direct relevance to the Airport chapter.

Section 74(1) of the RMA states that district plans must be prepared in accordance with the provisions of Part 2. The purpose of the RMA is the sustainable management of natural and physical resources which is defined in section 5(2) of the RMA as:

“...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 wellbeing, and for their health and safety while –

- (a) Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
- (b) Safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
- (c) Avoiding, remedying, or mitigating any adverse effects of activities on the environment.”*

To achieve the purpose of the RMA, all those exercising functions and powers under the RMA are required to:

- Recognise and provide for the matters of national importance identified in section 6
- Have particular regard to a range of other matters in section 7
- Take into account the principles of the Treaty of Waitangi in section 8 of the RMA.

There are no section 6 matters of national importance relevant to the Airport zone chapter.

The following section 7 matters are directly relevant to the Airport zone chapter:

- a) The efficient use and development of natural and physical resources;
- b) The maintenance and enhancement of amenity values;
- c) Maintenance and enhancement of the quality of the environment.
- d) The effects of climate change

Section 8 of the RMA requires that all persons exercising functions and powers under it take into account the principles of the Treaty of Waitangi, which have been considered in the preparation of the Airport zone chapter. It is acknowledged that there are Iwi and hapū interests in the land in which some of the airports are located, as discussed in section 3.5 below.

3.2 Higher order planning instruments

Section 75(3) of the RMA requires district plans to give effect to higher order planning instruments - National Policy Statements (**NPS**), the New Zealand Coastal Policy Statement (**NZCPS**), National Planning Standards (**Planning Standards**), and the relevant Regional Policy Statement (**RPS**). The **Section 32 Overview Report** provides a more detailed summary of the RMA higher order planning instruments relevant to the PDP.

The sections below provide an overview of the provisions in higher order planning instruments that are directly relevant to the Airport zone chapter.

3.2.1 National Planning Standards

Section 75(3)(ba) of the RMA requires that district plans give effect to the National Planning Standards. The National Planning Standards were gazetted in April 2019 and their purpose is to assist in achieving the purpose of the RMA and improve consistency in the structure, format and content of RMA plans. The following standards and directions in the National Planning Standards are of direct relevance to the Airport zone chapter:

- Standard 4 relates to district plan structure, making it mandatory for Council to include a special purpose Airport zone if it is relevant to the district plan.
- In standard 8, the Airport zone is described as “*Areas used predominantly for the operation and development of airports and other aerodromes as well as operational areas and facilities, administrative, commercial and industrial activities associated with airports and other aerodromes*”.
- Standard 15 relates to noise and vibration metrics, and includes specific direction for Council to include mandatory standards for the management and measurement of airport noise, in particular:
 - New Zealand Standard 6805:1992 Airport noise management and land use planning – measurement only, and
 - New Zealand Standard 6807:1994 – Noise Management and Land Use Planning for Helicopter Landing Areas- excluding 4.3 Averaging.

Council has created an Airport zone as per the National Planning Standards, incorporating the ‘AIRPZ’ unique identifier within the chapter, section and zone framework.

3.2.2 National Policy Statements

Section 75(3)(a) of the RMA requires that district plans give effect to any National Policy Statement (NPS).

Whilst there is no NPS directly relevant to the Airport zone chapter, it is however recognised that the National Policy Statement for Urban Development (**NPS-UD**) provides indirect references to the importance of managing infrastructure, such as airport facilities. The NPS-UD states that ‘nationally significant infrastructure includes “*any airport (but not its ancillary commercial activities) used for regular air transport services by aeroplanes capable of carrying more than 30 passengers*”.

However, much of the NPS-UD content is only applicable to local authorities that have urban areas that meet the definition of ‘urban environment’ as follows:

‘urban environment means any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that:

(a) is, or is intended to be, predominantly urban in character; and

(b) is, or is intended to be, part of a housing and labour market of at least 10,000 people’

Council commissioned the services of Informetric to understand the projected population growth of the District by Statistical Area 2 geographies. The population forecasts were produced under low, medium and high growth scenarios out to year 2072. Having assessed the figures, Council considers that none of its towns will reach the required threshold of 10,000 people to be considered an ‘urban environment’ as defined in the NPS-UD in the short, medium or long term.

In summary Council is not considered a tier 3 Council in terms of the NPS-UD as it does not have a housing or labour market of at least 10,000 people. This is discussed in further detail in the **Section 32 Overview Report**.

3.2.3 National Environmental Standards

Section 44 of the RMA requires local authorities to recognise national environmental standards (**NES**) by ensuring plan rules do not conflict or duplicate provisions in a NES. In this instance, there are no NESs that are directly relevant to the consideration of the proposed Airport zone.

3.2.4 Regional Policy Statement for Northland

Section 75(3)(c) of the RMA requires district plans to ‘give effect’ to any regional policy statement. The RPS was made operative on 14 June 2018. The policies and methods contained in the RPS contain guidance for territorial authorities for plan making. The table below outlines the provisions in the RPS that are directly relevant to Airport zone chapter:

RPS	
Objective 3.7	Regionally significant infrastructure
Objective 3.8	Efficient and effective infrastructure
Policy 5.1	Regional form
Policy 5.2	Effective and efficient infrastructure
Policy 5.3	Regionally significant infrastructure

In summary, in relation to the Airport zone, the RPS directs that District Councils:

- Impose regulatory controls that provide for high quality regionally significant infrastructure that can attract business and investment to the Region to support the economy, whilst managing any adverse effects on the environment and protecting health, safety, and social and community well-being.
- Help future-proof infrastructure for its long-term use and ensure that it can more efficiently adapt to changing technological, operational, economic, environmental and social conditions.
- Integrate strategic infrastructure planning between Northland and other regions, including Auckland, recognising that a well-functioning and effective transport system can improve business efficiency, innovation, competition and trade, support concentrations of economic activities and facilitate a mobile and flexible work force.
- Subdivision, use and development avoids constraints on the use and development of infrastructure.
- Encourage the development of infrastructure that is flexible, resilient, and adaptable to the reasonably foreseeable needs of the community.
- Promote the provision of infrastructure as a means to shape, stimulate and direct opportunities for growth and economic development.
- The Council recognises Kaitāia and Bay of Islands Airports as being regionally significant infrastructure.

Although the Kaikohe Airport (aerodrome) is not currently identified as ‘regionally significant infrastructure’, it is important that the PDP recognises the long-term needs of all three airports to ensure the continued operation, maintenance and protection of these significant assets. The Airport zone chapter has been developed to strike an appropriate balance between enabling airport related activities within the zone, whilst ensuring any adverse effects are managed.

3.3 Regional Plan for Northland

Section 75(4)(b) of the RMA states that any district plan must not be inconsistent with a regional plan for any matter stated in section 30(1) of the RMA. The operative Northland Regional Plans and proposed Northland Regional Plan are summarised in the **Section 32 Overview Report**.

There are no relevant objectives within the Regional Water and Soil Plan that directly relate to managing the effects of regionally significant infrastructure, such as airport activities.

The table below outlines provisions in the Proposed Regional Plan (appeals version) of direct relevance to the proposed Airport zone in the PDP.

Proposed Regional Plan	
Objective F.1.5	Enabling economic well-being
Objective F.1.6	Regionally significant infrastructure
Rule D.2.3	Climate change and development – potential effects on climate, contribution of carbon emissions from flights
Rule D.2.5	Benefits of regionally significant infrastructure – particular regard must be had to the national, regional, and locally significant social, economic and cultural benefits
Rule D.2.7	Minor adverse effects arising from the establishment and operation of regionally significant infrastructure
Rule D.2.8	Maintenance, repair and upgrading of regionally significant infrastructure – managing the adverse effects
Rule D.2.11	Protection of regionally significant infrastructure

The Proposed Regional Plan combines the operative Regional Plans (coastal, air quality, water and soil) into one plan.

The PRP proposes specific objectives and policies to manage the effects of the establishment, operation and maintenance of regionally significant infrastructure within the Region. The objectives recognise the significance of airport infrastructure at the national, regional and local level and the subsequent impact on economic wellbeing. In this case, the Bay of Islands and Kaitiāia airports contribute to the economic wellbeing of the region through the provision of domestic passenger flights and the movement of goods across the country.

The policies support the objectives which aim to ensure the appropriate recognition and protection of airport activities to enable the continued operation, maintenance and upgrade of these activities whilst managing any adverse effects on the environment or social, economic and community well-being.

The relevant objectives and policies have been taken into consideration in the drafting of the proposed Airport zone chapter to ensure the continued operation and maintenance of airport activities is balanced with managing potential adverse effects.

3.4 Iwi and Hapū Environmental Management Plans

When preparing and changing district plans, section 74(2A) of the RMA requires Council to take into account any relevant planning document recognised by an Iwi authority and lodged with the territorial authority, to the extent that its content has a bearing on the resource management issues of the District. At present there are 14 Iwi planning documents accepted by Council which are set out and summarised in the **Section 32 Overview Report**.

The Te Iwi O Ngai Takoto Environmental Plan is the only plan that refers directly to Airports in the District, with most commenting generally on other infrastructure and transport. The key issues in the Te Iwi O Ngai Takoto Environmental Plan that have been taken into account in the preparation of the provisions for Airport zone are as follows:

- Airports are identified as assets of interest in the Ngāitakoto Environmental Management Plan and are recognised for their importance as infrastructure to the District. The environmental management plan seeks the appropriate management of these assets within relevant planning documents with regards to hazardous substances, effects on natural hazards, and where appropriate recognition as partners to the Treaty of Waitangi.

Te Iwi O Ngai Takoto Environmental Plan recognises that:

“Infrastructure covers a wide range of essential services, including transportation (e.g. road, rail, bridge, airports, lighthouses and ports), with infrastructure regarded as essential for the economic, social, cultural, spiritual, and environmental health and wellbeing of the community.

NgāiTakoto considers that infrastructure should be developed and operated in a manner that is sustainable taking into account economic, social, cultural, spiritual, and environmental matters. Infrastructure development, operation, and maintenance is generally undertaken by the Crown and local authorities and, in due course, may be provided by third parties as the result of asset sales or privatisation.

In the past, land for infrastructure development was acquired by various means including the taking of land under the Public Works Act. Māori land has historically been confiscated in order to provide land for these services. There was little or no consideration of the ties that NgāiTakoto had to the land nor was there respect for cultural and spiritual values. While NgāiTakoto supports the need for infrastructure and the need to expand networks, commission or decommission plant, and to make provisions to effectively and efficiently operate infrastructure this does not give infrastructure developers and operators the automatic right to have an adverse effect on environmental, cultural, and spiritual wellbeing.

To avoid the repeat of mistakes of the past, NgāiTakoto expects to be actively involved in the process of developing new infrastructure and ensuring discharges from existing infrastructure do not adversely affect environmental, cultural, and spiritual values.

As we transition through the settlement process NgāiTakoto Iwi and our Te Tai Tokerau neighbouring tribes may also look to undertake (potentially in partnership with the Crown, local authorities or third parties), the infrastructure development within our rohe.”

Note: Natural hazards and hazardous substances are addressed in the ‘Natural hazards’ and ‘Hazardous substances’ chapters in Part 2 – District-Wide Matters of the PDP and the associated section 32 reports.

3.5 Other Legislation and Policy Documents

When preparing or changing a district plan, section 74(2)(b)(i) of the RMA requires Council to have regard to management plans and strategies prepared under other Acts to the extent that it has a bearing on resource management issues of the District. The **Section 32 Overview Report** provides a more detailed overview of strategies and plans prepared under legislation that are relevant to the PDP. This section provides an overview of other strategies and plans directly relevant to airports.

3.5.1 Long Term Plan

The Council Long-Term Plan 2021-2031 outlines the key proposals and projects that will be the fundamental focus and direction over the decade. The following matters are of particular relevance to the District’s three airports:

- Kaitiāia Airport: Land Information New Zealand has offered Council a 30-year lease for the Kaitiāia Airport and subsequent funding has been allocated to upgrade the airport runway to the value of approximately \$577,316 in 2021/22 and \$1,129,370 in 2022/23.
- Covid-19: The economic impact of Covid-19 is discussed in the report, with particular regard to the impact on business and revenues generated from the Bay of Islands Airport in the form of landing fees.
- Council provides for recreation facilities for communities to enjoy and contribute directly to their physical and social wellbeing, this includes Kaikohe Airport.

3.5.2 Community Development Plans

The Council, in conjunction with its communities, has developed 15 non-statutory Community Plans. These plans are designed to assist both the Council and the community to manage growth within their centres, whilst protecting those characteristics and features that the community values most. In this case, the Kaikohe and Kaitāia Community Development Plans are the most relevant plans as they recognise the importance of the airports as key transport routes, in particular Kaitāia and Bay of Islands Airports which provide and operate regular commercial flights.

3.5.3 Treaty of Waitangi Settlement Legislation

A Treaty settlement is an agreement between the Crown and an Iwi to give effect to a deed of settlement for all the historical claims by an Iwi against the Crown over land and any other resources taken in breach of Te Tiriti o Waitangi/Treaty of Waitangi. A claims settlement act formally records an agreed historical account, statutory acknowledgments and an apology from the Crown as well as any cultural, financial and commercial redress.

Treaty of Waitangi settlement legislation has been enacted for the following Iwi with rohe in the District:

Iwi	Settlement date
Te Roroa	29 September 2008
Ngāi Takoto	22 September 2015
Ngāti Kuri	22 September 2015
Te Aupōuri	22 September 2015
Te Rarawa	22 September 2015
Ngatikahu ki Whangaroa	21 August 2017

The settlement act of particular relevance to the Airport zone and Kaitāia Airport is the Ngai Akoto Claims Settlement Act 2015. As part of Treaty claim settlements, redress to Iwi can take the form of cultural redress, commercial redress and statutory acknowledgment areas. Of particular relevance to this context is that Kaitāia Airport is identified as a Deferred Selection Property (**DSP**) for Ngāi Takoto. DSP are Crown owned properties listed in the Deed of Settlement schedule for commercial redress. As such Ngai Takoto has a fixed time period to decide if it wants to purchase the property.

It is also noted that Ngāti Kahu, the fifth Te Hiku Claims Settlement Act entity, has a shared interest in the Kaitāia Airport. Ngāti Kahu has signed an Agreement in Principle but not yet proceeded to Deed of Settlement however, it may do so in the future.

The Kaikohe Airport is located within the area of interest of the largest Iwi, Ngāpuhi. It is also the subject of a Treaty Claim (Wai 302) by a number of Ngāpuhi whanau and was consolidated into Wai 1040 Te Paparahi o Te Raki. The Waitangi Tribunal Claim has been heard and Ngāpuhi and the Crown are continuing to work towards an agreement over multiple claims in the light of the Te Paparahi o Te Raki inquiry report. While not yet legislated for in a Treaty Settlement Claims Act Council is mindful of the history of the land and the on-going negotiations between the Crown, Ngāpuhi and the claimant whanau.

4 Current state and resource management issues

This section provides an overview of the relevant context for the Airport zone, the current approach to managing the airports through the ODP, and the key issues raised through consultation. It concludes with a summary of the key resource management issues for the Airport zone to be addressed through the PDP.

4.1 Context

The District has three airports; located in Kaikohe, Kerikeri and Kaitāia. Of these, only the Kaitāia and Bay of Islands Airports (Kerikeri) operate commercial flights as Kaikohe Airport is used as an aerodrome.

The Bay of Islands Airport is the only airport designated in the District Plan.

Each of the Airports is managed by height provisions that are in accordance with the identified airport protection surfaces, and there are noise thresholds applying between the 'Air noise boundary' and 'Outer control boundary' around Kaitāia and Bay of Islands Airports to protect noise sensitive activities.

4.2 Operative District Plan Approach

4.2.1 Summary of current management approach

The current management approach for airports relies on the use of designations and provisions in the District wide chapters to manage reverse sensitivity from noise sensitive activities and protect airport infrastructure:

- The relevant objectives, policies and provisions for managing airports are contained within Part 3 – District-wide Provisions of the ODP. These provisions are featured within the Transportation section under Chapter 15.2 Airports.
- Airport activities are managed by the airport protection surfaces and noise buffers that apply to each airport. The purpose of the airport protection surface is to manage the airport activities undertaken and avoid reverse sensitivity effects.
- As there is no Airport zone within the ODP, the underlying Rural Production zone provisions in Section 8.6 also apply to the airport sites applying a range of additional development controls including stormwater management, building coverage and boundary setbacks.
- The Bay of Islands Airport is enabled by underlying designation FH201 which is contained within Appendix 5 of the ODP.

4.2.2 Limitation with current approach

The Council has reviewed the current ODP approach, which has been informed by technical advice, internal workshops and feedback from the community and stakeholder feedback.

A number of limitations with the current ODP approach have been identified through this process, including:

- The ODP contains ad hoc provisions that do not provide a clear relationship between the airport provisions in Chapter 15.2 'Airports' and the underlying Rural Production zone.
- The ODP and relevant designations do not provide specific enablement for airport or compatible activities. This means that any new land uses proposed need to comply with the underlying zone, being Rural Production, which provides for limited commercial activities.
- The ODP contains a general objective that does not provide clear direction for the management of airports and subsequent airport activities.

4.3 Key issues identified through consultation

The **Section 32 Overview Report** provides a detailed overview of the consultation and engagement Council has undertaken with tangata whenua, stakeholders and communities throughout the District to inform the development of the PDP and the key issues identified through this consultation and engagement. This section provides an overview of key issues raised through consultation in relation to airports and a summary of advice received from Iwi authorities on airports.

4.3.1 Summary of issue raised through consultation

There was a low level of interest in the Airport zone from the community through consultation and engagement of the PDP. Key issues identified through the process include:

- *Council Resource Consents Division - Sought clarity on the role of the noise buffer and recommended that this be included within the PDP to manage reverse sensitivity effects resulting from airport activities.*

The PDP has addressed this by incorporating appropriate noise standards within the Noise chapter which seek to manage airport noise and avoid reverse sensitivity effects. Further, the proposed noise standards are in accordance with the mandatory direction provided in the Planning Standards, as noted in Section 3.2.1 above.

- *Z Energy Limited – Supports the definition of airport activities which is defined as “the use of land and/or buildings where the principal activities relate to the function and operation of New Plymouth Airport [sic]. These include, but are not limited to: - [...] - Fuel installations and fuel servicing facilities; - [...] They may include ancillary activities such as the sale of food and beverage which are ancillary to the principal activity.”*

Airport activities are provided for as a permitted activity, subject to standards around height, surfaces, setbacks, outdoor storage and coverage.

- *Mobil Oil and BP Oil New Zealand Ltd – Supports the definition of airport activity, recognising the important role these facilities provide at airports.*
- *FNHL – Opposes removal of the Bay of Islands Airport buffer zone.*

The PDP includes a revised buffer zone based upon technical advice provided by Marshall Day Acoustics. This is addressed in the Noise chapter and associated section 32 report.

Requests a Mixed Use zoning over part of the Bay of Islands Airport.

This is not regarded as necessary as the Airport zone in the PDP makes provision for airport activity, general aviation activity, and airport retail and commercial activity.

- *Vision Kerikeri – Requests that Kerikeri Airport be referred to as the Bay of Islands Airport.*
The reference in the PDP has been amended accordingly.

4.3.2 Summary of advice from Iwi authorities

Section 32(4A)(a) of the RMA requires that evaluation reports include a summary of advice on a proposed plan received from Iwi authorities. The **Section 32 Overview Report** provides an overview of the process to engage with tangata whenua and Iwi authorities in the development of the PDP and key issues raised through that process.

In principle, Te Runanga O Ngati Rehia support the policies.

No other feedback has been received from Iwi Authorities regarding the Airport zone provisions.

Section 3.4 above provided a summary of key concerns raised in the hapū and Iwi environmental management plans.

Section 5 of this report outlines how the proposed management approach responds to this advice in accordance with section 32(4A)(b) of the RMA.

4.4 Summary of Resource Management Issues

The Airport zone chapter was identified as a significant resource management issue (**SMRI**) in the development of the PDP. Airports are fundamental regionally significant infrastructure that are essential for the movement of people and goods.

Based on the analysis of relevant context, the current management approach, and feedback from consultation, the key resource management issues for the Airport chapter to be addressed through the PDP are:

- **Affordable Infrastructure** – Airports are an integral piece of infrastructure that facilitates economic growth within the District and enhances connectivity at the regional and national scale. The Council recognises the importance and function of the Kaitāia, Bay of Islands and Kaikohe Airports and the need to manage and protect the operation, maintenance and upgrade of airport facilities to ensure potential adverse effects such as reverse sensitivity are managed appropriately.
- **Partnerships with Tangata Whenua** - The Council recognises the importance of Iwi/hapū planning documents and as such has assisted in the completion of a number of management plans which articulate the cultural and spiritual values Māori have with resources. Airports are identified as significant resource assets by Ngāi Takoto who recognise the importance of airport infrastructure to the economic and social wellbeing of the District. Appropriate management of regionally significant infrastructure such as airports is a concern identified in the management plan given the potential adverse effects on cultural values. The outcome of the Treaty claim process may change the ownership status of the Kaitāia and/or Kaikohe Airports and a zone change may be an option following this.
- **Climate Change** – Airports are strategic transport infrastructure within the District. Bay of Islands and Kaitāia Airports provide regular flights to and from the District that collectively contribute to the carbon footprint, which subsequently contributes to New Zealand’s carbon footprint and climate change. Airport activities need to be managed appropriately to ensure the carbon footprint is minimised where possible and sustainable measures are enforced to manage the District’s contribution to transport related emissions.

5 Proposed District Plan Provisions

The proposed provisions are set out in the Airport zone chapter of the PDP. These provisions should be referred to in conjunction with this evaluation report.

5.1 Strategic Objectives

The PDP includes a strategic direction section which is intended to provide high level direction for the PDP and guidance on how best to implement the Council's community outcomes set out in its Long Term Plan. No strategic objectives are of direct relevance to the Airport zone.

5.2 Proposed Management Approach

This section provides a summary of the proposed management approach for the Airport zone chapter focusing on the key changes from the ODP. The **Section 32 Overview Report** outlines and evaluates general differences between the PDP provisions and ODP, including moving from an effects-based plan to a 'hybrid plan' that includes effects and activities-based planning, and an updated plan format and structure to align with the Planning Standards.

The main changes in the overall proposed management approach are:

- The ODP approach includes limited provisions for airport activities and as detailed in section 4.2 of this report, utilises a range of tools to manage airport activities, namely the provisions in Chapter 15.2 Airports.
- Airport zone provisions in the PDP are introduced as a standalone chapter within Part 3 – Area-Specific Matters. These changes are considered to align with the directions of the Planning Standards.
- The PDP provisions recognise and promote the benefits of airport activities and incorporate appropriate rules and standards that protect the flightpaths, runway surfaces and approaches.
- The PDP articulates the anticipated outcomes and overall purpose of the zone, with clear provisions that maintain the efficient and safe operation of airport facilities. Additionally, the approach enables a limited range of compatible airport activities that will support the overall function and viability of these resources.
- Include mapped noise contours in the PDP for Kaitiāia and Bay of islands Airports. The 'Air noise boundary' and 'Outer control boundary' extend into the adjacent zones with associated rules and standards applying for noise insulation for noise sensitive activities.

Overall, the approach recognises airport facilities as regionally significant transport infrastructure and their contribution to the District's economic and social wellbeing.

The sections below provide a high-level summary of the objectives, policies, and rules and other methods for airports.

5.3 Summary of proposed objectives and provisions

This section provides a summary of the proposed objectives and provisions which are the focus of the section 32 evaluation in sections 7 and 8 of this report.

5.3.1 Summary of objectives

The proposed management approach for airports includes objectives AIRPZ-O1, AIRPZ-O2, AIRPZ-O3 and AIRPZ-O4 that seek to:

- Recognise Kaitiāia and the Bay of Islands Airports as regionally significant infrastructure and the contribution they make to the economic and social wellbeing of the District, region and nation.
- Protect and provide for the future development of Kaikohe Airport as regionally significant infrastructure given its location and size.

- Recognise the viability of these facilities and where necessary protect them from reverse sensitivity effects.
- Provide for and protect the function and operational needs of airport facilities, while ensuring adverse effects of airport related activities are avoided, remedied or mitigated.

5.3.2 Summary of provisions

For the purposes of section 32 evaluations, 'provisions' are the *"policies, rules, or other methods that implement, or give effect to, the objectives of the proposed plan or change"*.

The proposed management approach for airports includes policies that:

- Manage land use and subdivision that limits the current and future operation of airport activities.
- Provide for the continued use of airport activities, and the potential expansion of airport activities where it does not compromise the amenity of the surrounding area.
- Manage the development of noise sensitive activities within the Airport zone to avoid potential reverse sensitivity effects and ensure the long-term viability of airport facilities.
- Enable a limited range of compatible non-aviation activities that do not compromise the long-term growth and development of airports.

The proposed management approach for airports includes rules and standards that include:

- Permitted activity rules that enable airport activities, general aviation activities, and airport retail and commercial activities where they are located outside of airport protection surfaces; conservation activity and the planting of trees.
- Standards to manage the bulk and location of buildings, structures and vegetation to ensure potential effects of built form within the zone does not adversely affect the functional requirements of the Airports, including:
 - Maximum height
 - Airport protection surfaces
 - Height in relation to boundary
 - Setback from boundaries
 - Outdoor storage
 - Coverage.
- Where compliance cannot be achieved with the permitted activity rules or standards, resource consent is required either as a discretionary or non-complying activity.
- Noise sensitive activities are not provided for in the Airport zone to avoid adverse reverse sensitivity effects.
- Introduce mapped noise contours that are a specific control for Kaitāia and Bay of Islands Airports which are based on future operating scenarios out to 2040. This includes supporting noise attenuation standards located in the proposed Noise chapter.

The proposed management approach for airports also involves the following methods to implement and give effect to the objectives:

- Mapped and identified Airport zone areas.
- Introduce outer control and air noise boundaries based on noise contours for the Bay of Islands and Kaitāia Airports. Provisions related to noise control boundaries are located in the Noise chapter in accordance with the directions of the Planning Standards.

As per the ODP, airport protection surface rules comprise 'planes' in the airspace around the Kaitāia, Kaikohe and Bay of Islands Airports and extend into adjacent zones. These zones include rules to manage land use within the airspace

Definitions related to Airports:

- A full list of definitions is included in the PDP.

5.3.3 Responding to advice from Iwi authorities

Section 32(4A) of the RMA requires evaluation reports to summarise advice received from Iwi authorities on a proposed plan and the response to that advice, including any provisions that are intended to give effect to the advice. Section 4.3.2 of this report provides a summary of advice received from Iwi authorities on the Airport zone. This was limited to feedback from Te Runanga O Ngati Rehia supporting the policies in principle.

6 Approach to Evaluation

6.1 Introduction

The overarching purpose of section 32 of the RMA is to ensure all proposed statements, standards, regulations, plans or changes are robust, evidence-based and are the most appropriate, efficient and effective means to achieve the purpose of the RMA. At a broad level, section 32 requires evaluation reports to:

- Examine whether the objectives in the proposal are the most appropriate to achieve the purpose of the RMA.
- Examine whether the provisions are the most appropriate way to achieve the objectives through identifying reasonably practicable options and assessing the efficiency and effectiveness of the provisions, including an assessment of environmental, economic, social and cultural economic benefits and costs.

These steps are important to ensure transparent and robust decision-making and to ensure stakeholders and decision-makers can understand the rationale for the proposal and the efficiency and effectiveness of the provisions. There are also requirements in section 32(4A) of the RMA to summarise advice received from iwi authorities on the proposal and demonstrate how that advice has been responded to through the provisions.

6.2 Evaluation of Scale and Significance

Section 32(1)(c) of the RMA requires that evaluation reports contain a level of detail that corresponds with the scale and significance of the environmental, economic, social and cultural effects that are anticipated from the implementation of the proposal. This step is important as it determines the level of detail required in the evaluation of objectives and provisions so that it is focused on key changes from the status quo.

The scale and significance of the environmental, economic, social and cultural effects of the provisions for airports are evaluated in the table below.

Criteria	Comment	Assessment
Raises any principles of the Treaty of Waitangi	<p>As summarised previously, it is acknowledged that there are Iwi and hapū interests in the land in which some of the airports are located. Of particular note, are the Kaikohe and Kaitāia Airports that are managed by FNHL, which are subject to ongoing discussions to transfer ownership back to Iwi as part of the Treaty Settlement process. The PDP chapter has been drafted to ensure the ongoing protection of the District's airports and it is not considered that the Airport zone provisions will raise any issues in relation to the Treaty of Waitangi that would undermine the settlement process. However, it is recognised that Iwi have particular interest in the underlying land over which the airports are established. The outcome of the Treaty claim process may change the ownership status of the Kaitāia and/or Kaikohe Airports and a zone change may be an option following this.</p> <p>In the context of this evaluation, the scale and significance of the zoning is considered to be medium.</p>	Medium

Criteria	Comment	Assessment
Degree of change from the Operative Plan	The Airport zone proposes specifically tailored provisions that represents a departure from the ODP approach. The approach recognises and protects airport facilities as regionally significant infrastructure for transport connections, while enabling compatible activities that are considered to support the economic viability of these assets.	Medium
Effects on matters of national importance	Airport activities are not located within any mapped or identified resource overlays that warrant heightened protection and management.	Low
Scale of effects – geographically (local, district wide, regional, national).	<p>The proposed Airport zone will identify the three existing airport facilities within the District, being in Kaikohe, the Bay of Islands and Kaitāia. The spatial and geographical extent is limited to the three sites, with the land currently managed by FNHL.</p> <p>The approach also incorporates noise control boundaries that have been modelled based on future operating scenarios of the Bay of Islands and Kaitāia airports. This will significantly reduce the number of affected properties that are required to incorporate noise attenuation measures into their design.</p>	Low
Scale of people affected – current and future generations (how many will be affected – single landowners, multiple landowners, neighbourhoods, the public generally, future generations?).	<p>The PDP introduces a zone-based approach that is limited to land that is owned by the Council/FNHL</p> <p>The noise control boundaries proposed as part of the Noise chapter are based on noise contours that model the future operating scenarios for the Kaitāia and Bay of Islands Airports. The noise contours will replace the Airport Buffer zone in the ODP and represent a considerable reduction in terms of affected properties and persons.</p>	Low
Scale of effects on those with specific interests, e.g., Tangata Whenua	<p>Those parties with a specific interest in airports are airport and flight operators, and industries directly benefit including the tourism industry.</p> <p>Consideration is given to ensuring that airport provisions appropriately provide for airport activities, whilst maintaining a level of amenity appropriate to the surrounding context. As such, there should not be any adverse effects on interested parties.</p>	Low
Degree of policy risk – does it involve effects that have been considered implicitly or explicitly by higher order documents? Does it involve effects addressed by other standards/commonly accepted best practice?	The management of airports are not explicitly identified as a significant resource management issue within the PDP. The RPS does however, identify the management of regionally significant infrastructure as an issue and includes specific objectives, policies and methods to protect their viability and use, while enabling their existing and planned operation for current and future generations. Kaitāia and Bay of Islands airports are identified as regionally significant infrastructure in Appendix 3 of the RPS. The PDP is considered to accord with the anticipated outcomes of the RPS.	Low

6.3 Summary of scale and significance assessment

Overall, the scale and significance of the effects from the proposal is assessed as being **low-medium**. Consequently, a low level of detail is appropriate for the evaluation of the objectives and provisions for airports in accordance with section 32(1)(c) of the RMA.

This evaluation focuses on key changes in the proposed management approach from the ODP. Minor changes to provisions for clarification purposes and to reflect new national and regional policy direction are not included in the evaluation in section 7 and 8 below

7 Evaluation of Objectives

Section 32(1)(a) of the RMA requires that the evaluation report examine the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA. The assessment of the appropriateness of the objectives for airports is against four criteria to test different aspects of ‘appropriateness’ as outlined below.

Criteria	Assessment
Relevance	<ul style="list-style-type: none"> Is the objective directly related to a resource management issue? Is the objective focused on achieving the purpose of the RMA?
Usefulness	<ul style="list-style-type: none"> Will the objective help Council carry out its RMA functions? Does the objective provide clear direction to decision-makers?
Reasonableness	<ul style="list-style-type: none"> Can the objective be achieved without imposing unjustified high costs on Council, tangata whenua, stakeholders and the wider community?
Achievability	<ul style="list-style-type: none"> Can the objective be achieved by those responsible for implementation?

Section 32 of the RMA encourages a holistic approach to assessing objectives rather than necessarily looking at each objective individually. This recognises that the objectives of a proposal generally work inter-dependently to achieve the purpose of the RMA. As such, some of the objectives for airports have been grouped in the evaluation below.

7.1 Evaluation of existing objectives

Objective: 15.2.2 To maintain the safe and efficient operation of airports in the District.	
Relevance	In the context of airports, the existing objective aims to enable the efficient and safe operation of airports to support and continue to contribute to the economic and social well-being of the District. It is noted however, that the objective does not provide direction to manage any potential adverse effects resulting from the operation of airports.
Usefulness	This objective does not provide clear direction for managing airport activities and any potential adverse effects, nor does it provide clear connection to the function and intent of the designation contained within Appendix 5 of the ODP. Despite the limited direction provided, this objective does give effect to the specific policy direction in the RPS relating to the safe and efficient operation of regionally significant infrastructure.
Reasonableness	Compliance costs are generated when persons within the 1.2km Airport Noise Buffer seek to develop noise sensitive activities, most commonly activities that are residential in nature. However, this Airport Noise Buffer does not correspond with known or actual effects and is substantially larger than the modelled noise contours of airport operations in 2040. For this reason, the existing provisions are not considered to be reasonable with respect to achieving the purpose of the RMA.
Achievability	This objective is rather broad and does not provide specific direction for the use and development of airports and subsequent airport activities which are not mentioned within Chapter 15.2.
Overall evaluation	
<p>The existing objective fails to address the resource management issues relevant to airports. In particular, it does not specifically recognise or address the specialised nature of these strategically important facilities and associated activities located in the District, or that their associated effects may differ from those that typically occur in the areas in which they are located. Consequently, the current objective provides insufficient direction and guidance to decision makers regarding the intended outcomes and specific activities and effects to be managed in relation to these facilities.</p> <p>Although the generic focus of the objective partially achieves the purpose of the RMA, in that it seeks to</p>	

maintain the safe and efficient use of these resources, it does not recognise the overall contribution that these facilities make towards the social, cultural and economic wellbeing of the District.

The lack of clearly expressed outcomes for airport facilities also creates ambiguity and uncertainty. This reduces the usefulness of the objective and could lead to unintended environmental and economic consequences. This, in turn, could impose unreasonable costs on facility owners and operators, as well as unanticipated remedial costs on the wider community if facility specific effects are inappropriately managed.

The current standalone objective also fails to give effect to the specific policy direction in the RPS relating to the safe and efficient operation of regionally significant infrastructure.

In light of the above, the existing objective is not considered appropriate in achieving the purpose of the RMA in relation to the management of the airport.

7.2 Evaluation of proposed objectives

Objective(s): AIRPZ-O1: The Kaitāia and the Bay of Islands Airports are regionally significant infrastructure and the contribution they make to the economic and social wellbeing of the District, region and nation are recognised.

AIRPZ-O2: Given its location and size it is important to protect and provide for the future development of Kaikohe Airport as regionally significant infrastructure.

AIRPZ-O3: Given its location and size it is important to protect and provide for the future development of Kaikohe Airport as regionally significant infrastructure.

AIRPZ-O4: The safe and efficient operation, maintenance and repair or upgrading of the Kaitāia, Bay of Islands and Kaikohe Airports are protected from other activities.

Relevance	In the context of airports, the proposed objectives are designed to provide for and protect the viability of the District’s airports, enable their function and operation, while managing potential adverse effects on the surrounding environment. In turn, these important physical resources will continue to contribute to the economic and social wellbeing of the District.
Usefulness	The proposed objectives are considered to give clear direction to the community, airport operators and Council decision makers when managing development within the proposed zone. Further, the proposed objectives give effect to the specific policy direction in the RPS relating to the safe and efficient operation of regionally significant infrastructure, and provide plan users and decision makers with increased certainty as to the outcomes anticipated under the District Plan.
Reasonableness	The proposed objectives and subsequent provisions are considered to be reasonable and relevant in the context of the RMA and are unlikely to impose unreasonable costs on the facilities and the wider community.
Achievability	The proposed provisions specifically seek to enable airport facility activities and, where appropriate, provide for compatible activities. It is considered that the objectives are achievable under the PDP as there is clearer direction and expected outcomes sought across the different zone environments. They provide clear direction of anticipated outcomes to the wider community and signal strategic importance to both operators and Council decision-makers.
Overall evaluation	
The objectives specifically and clearly set out the outcomes anticipated for the Airport zone and address the resource management issues identified by specifically recognising the national, regional and local contribution they make to social and economic wellbeing, and that they have unique operational requirements.	
The objectives also balance the requirements of these facilities with the need to ensure that any	

corresponding adverse effects on the environment are appropriately managed and, conversely, that their operation is not unduly compromised by incompatible activities or those that might generate reverse sensitivity effects, the latter of which will be managed through provisions applying across the district.

Overall, they are considered to achieve the purpose of the RMA, while introducing clear directions for the management of airport facilities. Additionally, this approach aligns with the directions set in the Planning Standards and give effect to the policy direction outlined in the RPS for regionally significant infrastructure.

8 Evaluation of Provisions to Achieve the Objectives

8.1 Introduction

Section 32(1)(b) of the RMA requires the evaluation report to examine whether the provisions are the most appropriate way to achieve the objectives by:

- (i) *identifying other reasonably practicable options for achieving the objectives; and*
- (ii) *assessing the efficiency and effectiveness of the provisions in achieving the objectives; and*
- (iii) *summarising the reasons for deciding on the provisions.*

When assessing the efficiency and effectiveness of the provisions in achieving the objectives, section 32(2) of the RMA requires that the assessment:

- (a) *identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—*
 - (i) *economic growth that are anticipated to be provided or reduced; and*
 - (ii) *employment that are anticipated to be provided or reduced; and*
- (b) *if practicable, quantify the benefits and costs referred to in paragraph (a); and*
- (c) *assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.*

This section provides an assessment of reasonably practicable options and associated provisions (policies, rules and standards) for achieving the objectives in accordance with these requirements. This assessment of options is focused on the key changes from the status quo as outlined in the 'proposed management approach' in section 5.2 of this report.

Each option is assessed in terms of the benefits, costs, and effectiveness and efficiency of the provisions, along with the risks of not acting or acting when information is uncertain or insufficient. For the purposes of this assessment:

- **effectiveness** assesses how successful the provisions are likely to be in achieving the objectives and addressing the identified issues.
- **efficiency** measures whether the provisions will be likely to achieve the objectives at the least cost or highest net benefit to society.

The sections below provide an assessment of options (and associated provisions) for achieving the objectives in accordance with sections 32(1)(b) and 32(2) of the RMA.

8.2 Quantification of benefits and costs

Section 32(2)(b) of the RMA requires that, where practicable, the benefits and costs (environmental, economic, social and cultural) of a proposal are quantified. The requirement to quantify benefits and costs if practicable recognises it is often difficult and, in some cases, inappropriate to quantify certain costs and benefits through section 32 evaluations, particularly those relating to non-market values.

As discussed in section 6.3, the scale and significance of the effects of proposed changes for airports are assessed as being low-medium. Therefore, exact quantification of the benefits and costs of the different options to achieve the objectives is not considered to be necessary or practicable for airports. Rather this evaluation focuses on providing a qualitative assessment of the environmental, economic, social and cultural benefits and costs anticipated from the provisions with some indicative quantitative benefits and costs provided where practicable.

8.3 Evaluation of options

8.3.1 Option 1: Status quo

Option 1: The ODP approach includes an objective and policies with a very narrow focus on the management of airports, and largely relies on the airport facilities existing use rights under section 10 of the RMA, the underlying Rural Production zone provisions, and specific rules and standards in Chapter 15.2 Transportation – Airports. Additionally, Kerikeri Airport is provided for by designation FH201.

Benefits	Costs	Risk of acting / not acting
<ul style="list-style-type: none"> The current plan provisions include limited objectives and policies for the management of airport facilities. They seek to maintain the safe and efficient operation of airports, but predominantly rely on existing use rights afforded under section 10 of the RMA and manage reverse sensitivity effects under chapter 15.5. Bay of Islands Airport is enabled by underlying designation FH201. Airport operators, the community and Council are familiar with the current provisions, with costs of administering this approach known and accepted. Chapter 15.2 includes reference to the Airport Noise Buffer, being a 1.2km radial buffer area that triggers resource consent for sensitive activities seeking to establish within the area. This provides certainty to the community, airport operators, and Council when consent is required. Where resource consent is required, it is a discretionary activity. 	<ul style="list-style-type: none"> Where resource consent is required (i.e. non-compliance with the permitted activity rule for Noise 15.2.5.1.2), it is a discretionary activity. The existing provisions do not include an appropriate policy framework to address as part of a consent application. Further, there is no policy direction on how the actual and potential effects of developing a noise sensitive activity can be mitigated. This means that there is little direction or certainty from landowners seeking dispensation from the ODP rules. The ODP approach relies heavily on section 10 of the RMA to facilitate operations but does not specifically enable upgrades and expansion of existing activities. This is considered to inadequately protect and provide for airport activities and does not recognise their role as regionally significant infrastructure. The Airport Noise Buffer layer was incorporated into the ODP to manage reverse sensitivity, however, was only intended as an interim method to manage reverse sensitivity while accurate noise contours were being modelled. The existing buffer areas are quite extensive, with all properties within a 1.2km 	<ul style="list-style-type: none"> The risk of acting is considered to be low to medium with regards to the status quo option. Despite there being insufficient information and clear gaps in the policy framework, airport operators and the community have not raised issues with the manner in which this approach is being administered. Regardless, this approach is not considered to adequately accord with the new directions of the RPS, Planning Standards or sufficiently account for sections 7(b), (c), and (f) of the RMA.

	<p>radius of the respective airport runway captured by the provisions regardless of actual effects of aeroplane noise emissions.</p> <ul style="list-style-type: none"> • The provisions provide limited enablement for airport facility operators when the nature of their activity changes and relies on the Rural Production zone framework that does not specifically manage airport activities or their effects. • Although the costs associated with these provisions are fairly understood, they are largely based on the informal noise attenuation measures such as window glazing, and engagement with FNHL in the case of the Kaitāia and Bay of Islands Airports. This leaves a gap in the process for the management of reverse sensitivity effects around the Kaikohe Airport. 	
<p><u>Effectiveness</u></p> <ul style="list-style-type: none"> • The ODP provisions include measures to protect airport facilities, specifically the runway and flightpaths, and to some degree manage the potential effects of reverse sensitivity. However, this option is considered to be disjointed with reliance on a range of provisions within the ODP to provide for airport activities as well as managing potential adverse effects. The status quo option does not adequately recognise airports as regionally significant infrastructure or their contribution to the economic and social wellbeing of the District. 	<p><u>Efficiency</u></p> <ul style="list-style-type: none"> • The ODP Airport Noise Buffer area was first incorporated into the plan as an interim measure to protect airport facilities from potential reverse sensitivity effects that could arise from the development of noise sensitive activities. However, the ODP approach captures all properties within a 1.2km radius from the centreline of airport runways. This has imposed compliance costs on landowners who are required to apply for resource consent. Additionally, the policy framework, rules and standards give little to no direction on the matters that need to be addressed through this consenting process. The costs and risk associated with Option 1 are considered to outweigh the benefits in achieving the purpose of the RMA. 	
<p><u>Overall evaluation</u></p> <p>On balance this option is not considered to be the most appropriate option to achieve the objectives because:</p> <ul style="list-style-type: none"> • There is an over reliance on section 10 of the RMA to provide for the existing operation and use of the airport facilities. • The existing objective fails to address the resource management issues relevant to airports. In particular it does not specifically recognise or address the specialised nature of these strategically important facilities and associated activities located in the District, or that their associated effects may differ from those that typically occur in the areas in which they are located. • The current objective provides insufficient direction and guidance to decision makers regarding the intended outcomes, and specific activities and effects to be 		

managed in relation to these facilities.

- The ODP approach is ad hoc and relies on a range of measures to support the functional need of airports and is not considered to adequately manage the potential adverse effects on the amenity values and qualities of the surrounding environments.
- The policy framework is lacking and does not adequately give effect to the directions of the RPS and Part 2 of the RMA.
- The compliance costs to community do not adequately reflect the adverse effects associated with the activity, in that the Airport Noise Buffer is a ‘blunt’ management tool that does not necessarily correspond with the actual and potential effects generated by airport operations, leading to unanticipated remedial costs on the wider community if facility specific effects are inappropriately managed.

8.3.2 Option 2: Special purpose Airport zone – preferred approach

Option 2: *The proposed Airport zone seeks clear outcomes for the District’s three airports, recognising their role as regionally significant infrastructure, and the important contribution these facilities make to the District’s economy. The approach works in collaboration with the Noise chapter to manage potential reverse sensitivity effects and includes airport specific rules and standards to promote the viability and future growth of airports. Specifically, the provisions:*

- *Enable airport activities that support the functional needs of these facilities, including permitted activities and standards.*
- *Manage noise sensitive activities by incorporating Noise Control Boundaries, being modelled noise contours of future operating scenarios for Kaitāia and Bay of Islands Airports out to 2040.*
- *Recognise airport facilities as regionally significant infrastructure.*

Benefits	Costs	Risk of acting / not acting
<ul style="list-style-type: none"> • Directly recognises and enables the continued, functional use of the airport facilities for their primary purpose. • Provides facilities with increased flexibility to develop and adapt, thereby leading to improved efficiencies in land use. • Enables standard operational activities to be undertaken without the need to obtain resource consent. • Provides increased certainty and clarity to facilities regarding the nature and scale of onsite activity and development anticipated. • Provides the community with increased certainty regarding the development aspirations of facilities, 	<ul style="list-style-type: none"> • Although this approach introduces provisions to manage airport activities, the Kaikohe Airport is not a commercially operated facility, and is principally used as a small-scale aerodrome for small motorised and non-motorised aircraft. The approach removes the ODP Airport Buffer Noise overlay which is designed to manage potential reverse sensitivity effects. This has the potential to impact future development and expansion of the Kaikohe Airport facility. • There are still compliance and administrative costs associated with this approach for the community, airport operators and the Council. 	<ul style="list-style-type: none"> • A clear risk associated with this approach is the lack of information and understanding of Kaikohe Airport operations, which is the largest (by land area) airport facility. Currently, the airport is utilised by the local Aerodrome Club with comparatively low aircraft noise emissions and aircraft traffic when compared with the two other facilities. Whereas the Kaitāia and Bay of Islands Airports are managed by FNHL, facilitate regional commercial flights and are identified in Appendix 3 of the RPS as regionally significant infrastructure. This means that the Kaikohe Airport noise emissions have not been modelled, and therefore does not incorporate noise contours to manage the development of

<p>specifically as they relate to future airport operations for Bay of Islands and Kaitāia Airports.</p> <ul style="list-style-type: none"> • Tailored rules, effects standards and assessment matters provide a clear framework to manage facilities and seek to strike a balance between efficient site development and avoiding or minimising adverse effects on surrounding areas. • Potential reduction in time/cost to airport operators, the community, and Council of preparing and processing resource consent applications as the modelled noise contours significantly reduce the spatial extent for where the provisions apply at the Bay of Islands and Kaitāia airports, in addition to removing the buffer area around Kaikohe Airport. • Introduces an airport specific policy framework that gives effect to the RPS and aligns with directions in the Planning Standards. 		<p>sensitive activities.</p> <p>However, despite this, this option is still considered to be preferred as the approach will provide a greater level of certainty for the continued operation of existing airport activities and introduces a policy framework that provides a consenting pathway for future expansion of these facilities. Additionally, the approach accords with the RPS and is considered to be an appropriate means of addressing the relevant matters in Part 2 of the RMA.</p>
<p><u>Effectiveness</u></p> <ul style="list-style-type: none"> • The proposed rules and standards are effective as they recognise the important functional contribution airports make to the District. They explicitly respond to their operational and development requirements, including clearly identifying activities that are permitted as of right along with relevant thresholds that trigger the need for resource consent. This, in turn, offers increased clarity and certainty to facilities as well as the community more generally, and provides flexibility to enable these facilities to develop and adapt while ensuring that any impacts on adjacent areas are minimised. 	<p><u>Efficiency</u></p> <ul style="list-style-type: none"> • The proposed option is also an efficient method of achieving the objectives as the airport specific nature of the associated provisions (including the noise control boundaries) could result in reduced operational and development related compliance costs for operators, Council and the community. 	
<p><u>Overall evaluation</u></p> <p>On balance this option is considered to be the most appropriate option to achieve the objectives because:</p> <ul style="list-style-type: none"> • Overall compliance and administration costs of this option will be considerably less than those of Option 1, due to the updated approach for the management of noise sensitive activities within close proximity to the airport facilities. • The proposed provisions effectively respond to operation and development requirements of airport facilities, and introduce a framework that clearly recognises the functional and economic contribution these assets make to the District. • The PDP approach includes relevant thresholds and triggers for when resource consent is required, and provides flexibility to enable these facilities to develop and adapt while ensuring that any impacts on adjacent areas are minimised. • Option 2 is considered to more appropriately manage the efficient use and development of these important strategic assets and creates an effective framework 		

to manage the related amenity values and qualities of the surrounding rural production zone environments.

8.3.3 Option 3: No provisions

Option 3: Remove all provisions of the PDP that relate to airport activities, relying on section 10 of the RMA for existing activities and the provisions of the proposed Rural Production zone to manage future expansion of airport facilities

Benefits	Costs	Risk of acting / not acting
<ul style="list-style-type: none"> This approach is similar to Option 1, but removes the Airport Noise Buffer, noise sensitive activity rule and height standards for flightpaths. This removes a layer of regulation for surrounding properties. Reduced compliance and administration costs for Councils and community as there is no longer any requirement to manage noise sensitive activities. 	<ul style="list-style-type: none"> This option has the potential to undermine the purpose and function of airport facilities as there is no framework to facilitate future development. Additionally, noise sensitive activities, including residential units, will have the ability to establish in close proximity to airports without any location and design considerations. This has may give rise to increased complaints regarding the effects generated by the airport activities. Potential limitations on economic growth and employment opportunities as reliance on the existing zoning framework with more targeted standards may be insufficient to meet the current and future operational and development needs/demands of airport facilities. Option 3 does not provide an adequate level of clarity or certainty to the community regarding the development aspirations of facility owners/operators. 	<ul style="list-style-type: none"> There are considered to be moderate risks associated with this option, in that the provisions do not adequately deliver rules and standards that maintain the function and efficiency of airport operations. Further, the adverse reverse sensitivity effects that can arise from surrounding sensitive activities may compromise future development aspirations of airport facilities, putting the future viability of airport facilities at risk.
<p>Effectiveness</p> <ul style="list-style-type: none"> Option 3 is not considered to effectively address the resource management issues related to airport facilities and ultimately does not accord with the RPS 	<p>Efficiency</p> <ul style="list-style-type: none"> Option 3 has the potential to reduce the overall compliance and administrative costs that are related to Options 1 and 2, however, this is not considered to 	

<p>or purpose of the RMA.</p>	<p>outweigh the loss in protections afforded by the status quo and PDP frameworks. Additionally, this approach may impose risks to Council in terms of executing their functions and powers under section 31 of the RMA.</p>
<p><u>Overall evaluation</u></p> <p>On balance this option is not considered to be the most appropriate option to achieve the objectives because:</p> <ul style="list-style-type: none"> • It has the potential to undermine the purpose and function of airport facilities, both for existing activities and future development of these strategic assets. • An unregulated approach has the potential to create uncertainty which may ultimately undermine the viability of these regionally significant resources and have adverse impacts on the social and economic wellbeing of the District. • The approach poses risks and is considered to be less effective and efficient in achieving the objectives, as the lack of provisions would lead to a less efficient use and development of these resources. 	

9 Summary

An evaluation of the proposed objectives and provisions for the Airport zone chapter has been carried out in accordance with section 32 of the RMA. This evaluation has concluded that the objectives are the most appropriate way to achieve the purpose of the RMA and the provisions are the most appropriate way to achieve the objectives for the following reasons:

- The consolidated Airport zone chapter provides for a simpler and integrated plan framework and structure.
- The objectives and policies are designed to provide for and protect the function and operational needs of airport facilities, while ensuring adverse effects of airport related activities are avoided, remedied or mitigated. Further, the objectives recognise airports as regionally significant infrastructure, and the viability of these facilities are promoted and where necessary protected from reverse sensitivity effects.
- The amenity values and qualities of surrounding environments are maintained with appropriate rules and standards that ensure an adequate level of noise attenuation is incorporated into the design and location of noise sensitive activities.
- Permitted activity rules that enable airport activities, general aviation activities, and a limited range of airport retail and commercial activities where they are located outside of airport protection surfaces, subject to meeting the relevant rules and associated effects standards.
- Where compliance cannot be achieved, resource consent as a discretionary or non-complying activity is required. This will ensure a suitable level of scrutiny can be applied when resource consent is sought for activities that have the potential to compromise airport functions.

Overall, it is considered that the proposed provisions are the most appropriate given that the benefits outweigh the costs, and there are considerable efficiencies to be gained from adopting the preferred provisions.