

Nelson Airport Limited:

Notice of Requirement and Private Plan Change – Nelson Airport



Trent Drive, Nelson

Section 181 Notice of Requirement for
Alterations to Designations

Airport Purposes Plan Change to the Nelson
Resource Management Plan



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ACRONYMS

AECO	Airport Effects Control Overlay
AMP	Acoustic Mitigation Programme
ANB	Airnoise Boundary
ANMR	Airport Noise Monitoring Report
ASAN	Activities Sensitive to Airport Noise
CMA	Coastal Marine Area
FANC	Future Aircraft Noise Contours
NCC	Nelson City Council
NAL	Nelson Airport Limited
NMMP	Noise Management and Monitoring Plan
NoR	Notice of Requirement
NRMP	Operative Nelson Resource Management Plan
NZS6805:1992	New Zealand Standard 6805: Airport Noise Management and Land Use Planning (1992)
OLS	Obstacle Limitation Surface
PPC	Private Plan Change
RESA	Runway End Safety Areas
RMA	Resource Management Act 1991

Resource Management Act 1991

Fourth Schedule

Assessment of Effects on the Environment

1 Executive Summary

This report supports applications to the Nelson City Council (**NCC**) for a Private Plan Change (**PPC**) pursuant to Schedule 1 of the Resource Management Act (**RMA**, or the **Act**) and an associated Notice of Requirement (**NoR**) for alterations to existing designations for Nelson Airport.

The applicant for the PPC is Nelson Airport Limited (**NAL**). NAL is the requiring authority for the relevant designations.

NAL is the owner and operator of Nelson Airport (**Nelson Airport** or **the Airport**), which is a nationally and regionally significant infrastructure asset for the greater Nelson-Tasman region. Nelson Airport is located at the top of the South Island, south-west of the Nelson City Centre. It is one of the busiest regional airports in New Zealand.

The current runway length at Nelson Airport is among the shortest in the world catering for the types of aircraft it serves, leading to reliability and resilience issues for Nelson Airport as well as limiting the Airport's ability to accommodate next generation sustainably powered aircraft. NAL has identified a need for an extension to the existing main runway at Nelson Airport (the northern runway extension), to ensure it can provide for the expected needs of future aircraft types, remove operating constraints experienced by existing aircraft to improve reliability, and improve safety through the provision of Runway End Safety Areas (**RESA**).

NAL's existing three Designations in the Nelson Resource Management Plan (**NRMP**) for Nelson Airport, as well as the planning provisions applying to Airport land within the NRMP, are outdated given they were introduced through the Operative Plan in September 2004. The NoR seeks to enable an extension to NAL's existing main runway and the PPC seeks to update the existing plan provisions to remove outdated provisions and provide a consistent approach to regulating activities sensitive to airport noise (**ASAN**) within other chapters of the NRMP.

For the planning provisions applying to the Airport land, an integrated suite of provisions set out in the proposed Airport Zone are considered to be the most appropriate way to achieve the purpose of the RMA.

The suite of planning provisions in the proposed Airport Zone will be integrated with a cohesive and contemporary suite of Designations conditions for Airport land use (set out in Designation DAA1) and will enable the northern runway extension.

As a consequence of extending the existing main runway, associated changes are required to Designation DAA2 to the Airnoise Boundary (**ANB**) and responsibilities associated with aircraft noise. Amendments are also required to the Airport Height Restrictions (or Obstacle Limitation Surface (**OLS**)) set out in Designation DAA3. Amendments to Designation DAA2 to alter the ANB and Designation DAA3 to alter the OLS are based on a composite scenario of the existing main runway and extended main runway. The alterations to NAL's existing designations in the NRMP are reasonably necessary for NAL to achieve its objectives of the NoR.

In 2019, domestic and international aviation accounted for 6% of New Zealand's total gross greenhouse gas emissions. If New Zealand is to achieve its net zero greenhouse gas emissions goal by 2050, domestic and international aviation emissions must be reduced. Significant effort is being expended globally to develop low emission and zero emission aircraft which include battery-powered, hydrogen-powered and sustainable aviation fuels-powered aircraft. These sustainably powered aircraft types will have different operational requirements, including requiring a longer runway length to take off and land due to being heavier.

As noted above, one of the key aspects to NAL's objectives for extending the main runway is to facilitate sustainably powered next generation aircraft which require longer runway lengths than the existing main sealed runway of 1,347m. NAL is committed to ensuring it can appropriately and safely provide for sustainably powered next generation aircraft in the future. In anticipation of the impending arrival of sustainably powered next generation aircraft types, Nelson Airport requires significant infrastructure upgrades, such as an extension to its existing main runway to ensure the Airport is equipped to accommodate next generation aircraft.

1.1 Notice of Requirement to alter NAL's existing designations

NAL is seeking to alter its existing designations in the NRMP, being Designation DAA1, Designation DAA2 and Designation DAA3, to achieve its objectives of the NoR.

NAL's objectives for altering its existing designations are to:

- ~ *Extend the operational runway length in order to ensure that over the next 30 years the aeronautical capacity of the airport and runway system can safely and efficiently:*
 - *provide increased operational resilience and reliability; and*
 - *enable forecast demand and accommodate future aircraft types.*
- ~ *Enable an efficient, flexible and sustainable approach to developing Airport infrastructure, facilities and services.*
- ~ *Minimise the effects of aircraft noise impacts on the surrounding community as far as practicable whilst also minimising adverse environmental and cultural effects.*

To ensure the land required to achieve its objectives is recognised in the NRMP, NAL is seeking the NoR to designate additional land, where it does not have an interest in the land sufficient for undertaking the work, for this purpose. This ensures that:

- (a) The land, and the Proposed Conditions for its use and development for aviation and airport purposes, are identified in the NRMP;
- (b) Both NAL as the requiring authority and the wider community has certainty as to:
 - a. NAL's ability to undertake works within the DAA1 designated area;
 - b. the management and forecast noise exposure under Designation DAA2; and
 - c. the activities and structures which are precluded by way of Designation DAA3 where those would penetrate the OLS.
- (c) There is certainty, to both NAL, the Council and wider community as to the parameters under which activities can occur.

NAL has undertaken a comprehensive assessment of reasonable alternatives, following which it was determined that the main runway should be extended to the north of the existing main runway to achieve an operational length of 1,510 metres. In conjunction with the runway extension, NAL seeks to provide RESA at each end of the runway which serve the important function of reducing the risk of damage to aircraft in the event of an undershoot, overshoot or excursion from the runway and will be required by Civil Aviation rules in the event Nelson Airport's runway is extended by more than 15m.

As a result of the runway extension, changes are also required to the OLS and Aircraft Noise Contours.

There is a need to accommodate both the configuration and operations associated with the OLS and Aircraft Noise Contours of the existing main runway and those associated with the extended main runway, until such time as the northern runway extension is constructed and operational.

Accordingly composite controls are provided to ensure the effects and protections associated with both the existing southern runway threshold and proposed extended northern runway threshold are accommodated within the ANB (DAA2) and the OLS (DAA3). NAL will subsequently give notice (under Section 182 of the RMA) of the removal of the superseded elements of the southern aspects of Designation DAA2 and DAA3 when the existing southern runway threshold is displaced northwards when the runway extension has become operational.

1.2 Private Plan Change request

In conjunction with seeking alterations to its existing Designations to enable an extension to the existing main runway, NAL is also requesting a PPC to the NRMP to:

- provide a clear planning framework for NAL and the community regarding activities anticipated within the Airport context through a specific Airport Zone; and
- ensure the contemporary role and function of the Airport, in terms of its strategic importance to the Nelson-Tasman region and country is recognised in the NRMP; and
- provide a consistent approach to managing ASAN in the NRMP in order to manage reverse sensitivity effects and ensure communities around the Airport are developed with healthy living environments.

The proposed provisions, including the objectives of the PPC, are considered the most appropriate and effective means of achieving the purpose of the RMA, compared to the current provisions in the NRMP or other alternative options.

1.3 Other approvals

In addition to the NoR applied for by NAL, there will be regional resource consents, authorisations and approvals that will be required in future, prior to works commencing for the northern runway extension. The nature and extent of these future regional resource consents will be determined at detailed design and are not addressed in this documentation.

Regional resource consents will be sought in the future for a number of activities (including land use consents, water permits and discharge permits) as required by the relevant provisions of the NRMP as a Unitary Plan under the RMA, and in relation to the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (**NES-F**).

In addition, authorisations will be needed in terms of an archaeological authority required by the Heritage New Zealand Pouhere Taonga Act 2014, and authorisation may be required by the

Director-General of the Department of Conservation under section 53 of the Wildlife Act 1953 in relation to any protected wildlife.

1.4 Effects of the NoR / PPC

The effects on the environment of allowing the NoR and PPC are evaluated in detail in this Application as supported by expert technical reports. The evaluation identifies that there is a change to the existing environment as a consequence of the NoR / PPC, with commensurate adverse effects.

Allowing the NoR and PPC will result in minor adverse effects as associated with noise exposure, ecology and landscape.

Noise effects are reduced through conditions in the NoR, particularly in relation to NAL's responsibilities in terms of compliance and monitoring of Aircraft Operations at the ANB, monitoring and reporting requirements and the Acoustic Mitigation Programme (**AMP**). Provisions have been proposed in the PPC to provide for a cohesive approach (across all relevant zones) to the avoidance of ASAN that may be affected by, or increase the incidence of, reverse sensitivity effects on Aircraft Operations. The approach towards indoor amenity effects (through both Conditions on the NoR and Plan provisions / APP19.1) are appropriate to address changes in receivers and increased noise enabled by the NoR. The approach in plan provisions seeking to prohibit additional ASAN in the ANB and controls on site density also seek to address issues with outdoor amenity. The approach is consistent with NZS6805:1992 as applied to the Nelson situation¹.

For ecology and landscape, some effects are associated with the extent to which works enabled by the NoR, including the extension to the main runway and RESA, would impact on the values associated with the Maire Stream tributary. Whilst the assessments are predicated on the 'worst case' scenario of piping / culverting the tributary,² the detailed design / regional consenting processes will appropriately manage the effects of such activities. The proposed Landscape and Design Plan is recommended in the NoR to address potential adverse landscape, natural character and visual effects.

With regard to Archaeological values and Historic Heritage, the extension to the main runway as facilitated by the NoR has the potential to disturb unrecorded archaeological sites and features associated with the pre-European Māori use, as well as that associated with the use of the extended NoR as World War II as a Royal New Zealand Air Force (RNZAF) station and camp. However, should a site be encountered with the Conditions in the NoR, the residual effect would be no more than minor³.

All other effects are considered to be no more than minor and can be appropriately managed by the comprehensive suite of Proposed Conditions to the NoR and PPC provisions.

NAL therefore seeks that NCC accept the PPC as included at **Attachment A** to this report and that the PPC be publicly notified with the NoR.

NAL seeks that NCC confirm the NoR subject to the Proposed Conditions included at **Attachment B** to this report.

¹ **Attachment K2.** Marshall Day Acoustics [13].

² **Attachment H2.** Boffa Miskell [pg 6 – 10], Attachment J2 [7].

³ **Attachment G2.** Underground Overground [Table 1].

2 Introduction

Overview – Notice of Requirement

NAL is seeking to alter its existing designations in the NRMP, being Designations DAA1, DAA2, and DAA3, to enable an extension to its existing main runway.

NAL's objectives for altering its existing designations are set out in section 1.1 of this Application.

This report describes NAL's NoR and has been prepared in accordance with section 181 of the RMA.

In accordance with the Resource Management (Forms, Fees and Procedure) Regulations 2003, Form 18 for the alterations to DAA1, DAA2 and DAA3 is included with this Application.

An overview of the proposed alterations is set out in the below table.

Requiring authority:	NAL
Territorial authority:	NCC
Nature of notice:	DAA1 Aerodrome (Nelson Airport) DAA2 Airnoise boundary controls DAA3 Airport Height Restrictions
Site address / location of site	DAA1 - Nelson Airport, area occupied by NAL and includes part of the Airport Peninsula and land along Bolt Road. It also includes sections along Point Road. Extended to include part of Nelson Golf Club. [Attachments B2 and B5] DAA2 - Nelson Airport, NAL land, residential properties at the southwestern end and north-eastern end of the main runway, part of the Tāhuna Beach Holiday Park at the north-eastern end of the main runway, part of the golf course Nelson Golf Club, and part of Point, Parkers, Golf and Grace Roads. [Attachments B3 and B6] DAA3 – Airport height restrictions [Attachments B4 and B7]
Legal Description:	DAA1 - <i>The operative DAA1 Designation being:</i> Lot 1 DP 19886, Crown Land (under action) Suburban South District, Crown Land Block III Waimea District, Part Section 34 SQ 1, Lot 4 DP 18321, Lot 9 DP 18321, Lot 2 DP 18320, Lot 3 DP 18321, Lot 6 DP 18321, Lot 5 DP 18321, Lot 10 DP 18321, Lot 1 DP 18320, Lot 3 DP 18320, Lot 8 DP 18321, Lot 1 DP 18321, Lot 2 DP 18321, Lot 4 DP 18320, Lot 7 DP 18321, Lot 1 DP 472101, Section 114 Suburban South DIST, Section 1 SO 301599. <i>As extended to the north to include:</i> Lot 2 DP 472101, Lot 2 DP 409237, Lot 2 DP 17638, Part Section 111 Suburban South DIST, Lot 2 DP

	<p>493143, Lot 3 DP 472101, Part Section 111 Suburban South DIST, Part Section 85 Suburban South DIST. (refer Figure 1)</p> <p>DAA2 – Land owned by NAL and described as:</p> <p>Lot 1 DP18320, Lot 10 DP18321, Lot 2 DP18320, Lot 3 DP18321, Lot 4 DP18321, Lot 5 DP18321, Lot 6 DP18321, Lot 7 DP18321, Lot 8 DP18321, Lot 9 DP18321, Pt Sec 85 SO 14214, Sec 114 Sub Sth SO 10100, Pt Sec 111 SO 14214</p> <p><i>Residential properties at the southwestern end of main runway 02/20 and described as:</i></p> <p>Pt Sec IV DP3140, Lot 1 DP7586, Lot 2 DP362535</p> <p><i>Land in other ownership:</i></p> <p>Golf Club: Lot 2 DP17638, Pt Sec 85 Sub Sth SP 9198, Pt Sec 111 SO 9526, Lot 2 DP 472101, Lot 2 DP 493143, Lot 1 DP 18577</p> <p><i>Part of Point Road and part of Grace Street.</i></p> <p>Also, Lot 1 DP10689, Pt Sec IV DP1288, and Pt Sec IV Sub Sth DP 599.</p> <p><i>As extended to the north to include:</i></p> <p>Lot 1 DP 8322, Lot 4 DP 1826, Lot 1 DP 18377, Lot 1 DP 522944, Lot 2 DP 4493, Lot 1 DP 5115, Lot 2 DP 9182, Part Lot 106 DP 288, Lot 1 DP 493143, Lot 3 DP 14232, Lot 1 DP 14232, Lot 3 DP 9182, Lot 1 DP 10457, Lot 2 DP 522944, Lot 1 DP 4493, Lot 1 DP 9182, Lot 2 DP 4567, Lot 3 DP 6951, Lot 1 DP 4563, Lot 1 DP 4118, Lot 2 DP 4118, Lot 3 DP 1826, Lot 3 DP 4118, Lot 1 DP 4567, Lot 2 DP 6951, and Lot 1 DP 9051.</p> <p>DAA3 – Airport Height Restrictions [Attachment B4]</p>
Ownership Status and Site Area:	<p>DAA1 – NCC, NAL, Nelson Golf Club [Attachment B2]: 143.8ha*</p> <p>DAA2 – [Attachment B3]: 113.2ha</p> <p>DAA3 – [Attachment B4]: 586.8ha</p> <p><i>* The NRMP incorrectly lists the operative DAA1 Designation Area as 145ha. The existing DAA1 designation is 125ha.</i></p>
District Plan Zoning:	<p>NRMP:</p> <p>DAA1 – Industrial Zone, Open Space and Recreation, Residential.</p> <p>DAA2 – Industrial, Open Space and Recreation, Residential.</p>

	<p>DAA3 – Industrial, Open Space and Recreation, Residential, Suburban Commercial, Conservation.</p> <p>Note: This NoR is accompanied by a PPC that seeks to rezone the area subject to DAA1 from Industrial Zone and Open Space and Recreation Zone to Airport Zone.</p>
Amendments to NRMP:	<ol style="list-style-type: none"> 1. Amends Appendix 24 of the NRMP Designations DAA1, DAA2 and DAA3: <ol style="list-style-type: none"> a. DAA1 Aerodrome (Nelson Airport) to: <ol style="list-style-type: none"> i. Increase the spatial extent of the designation to provide for the northern runway extension. ii. Update the Designation to ‘Airport and Aerodrome Purposes’. iii. Confirm the nature of the works authorised including ‘Aviation Activities’ and ‘Airport Related Activities’ as well as a range of other activities and facilities associated with, and ancillary to a contemporary airport. iv. Clarify the conditions associated with the designation, including those associated with establishing the northern runway extension. b. DAA2 ANB controls to: <ol style="list-style-type: none"> i. Update the ANB based on contemporary modelling, fleet mix and growth projections. ii. The required ANB is based on a composite of two scenarios: forecast future activity on the existing main runway and on an extended main runway. That is the DAA2 ANB is the outer envelope when those two scenarios are overlaid. iii. Confirm the Airport Operator’s responsibilities in terms of noise exposure management, and monitoring and compliance. iv. Confirm the conditions of the designation in terms of restrictions on aircraft operations. v. Establish requirements in terms of monitoring and mitigation, including the Annual Aircraft Noise Contours (AANC); as well as Airport Noise Monitoring Report (ANMR), Airport Noise Management and Monitoring Plan (NMMP), and AMP. vi. Provide for the role of the Nelson Airport Noise and Environmental Advisory Committee. c. DAA3 Airport Height Restrictions to:

	<p>i. Update the OLS based on a composite of the existing runway configurations, and the extended main runway, including specifications.</p> <p>2. Amend the Planning Maps, including Overlays:</p> <p>a. The ANB (65dB L_{dn}).</p> <p>b. The spatial extent of Designation DAA1 'Airport and Aerodrome Purposes'.</p>
Additional Consents:	Section 1.3 and 1.4 of this Application identifies that a number of regional resource consents, authorisations and approvals will be required in the future once more detailed design of the northern runway extension has been undertaken and prior to works commencing.

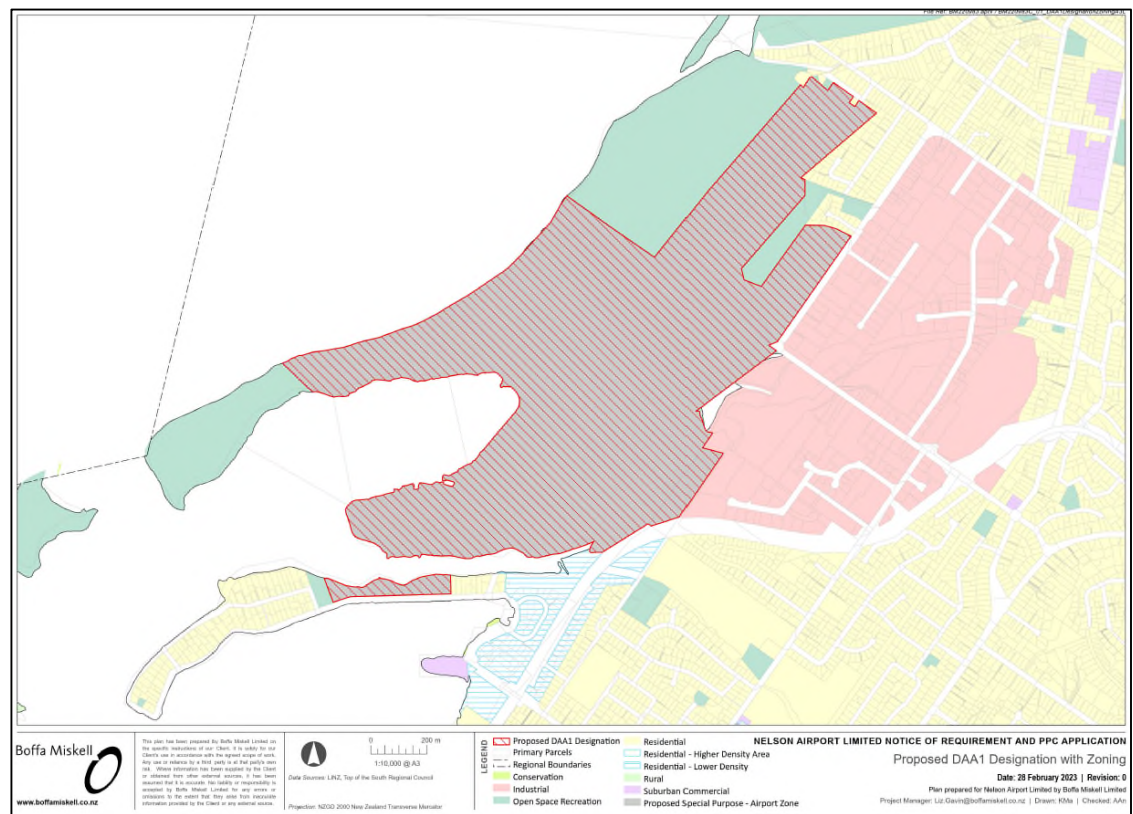


Figure 1: Proposed DAA1 and Airport Zone Extent

2.1 Request for Private Plan Change

In conjunction with the NoR, NAL requests that the NRMP is amended to provide for a specific Airport Zone, remove consequential redundant industrial provisions in the underlying zoning for the Airport, provide for a consistent region wide approach to managing ASAN, and clarify the role and function of the Airport as nationally and regionally significant infrastructure.

This PPC has been prepared in accordance with section 32 and Schedule 1 of the RMA and an overview of the PPC is outlined in the below table.

Chapter 2 – Interpretation Attachment A1	To include meanings for a number of terms used within introduced provisions, including, but not limited to: <ol style="list-style-type: none"> 1. Airport Effects Control Overlay (AECO) 2. ANB 3. Aircraft Operations 4. Aircraft Engine Testing 5. Airport Related Activity 6. AANC 7. ASAN 8. Aviation Activity 9. Future Aircraft Noise Contours (FANC)
Chapter 3 – Administration Attachment A2	To include and amend: <ol style="list-style-type: none"> 1. References to the Airport Zone within Section AD11.2 ‘Description of zones’. 2. References to the ANB and AECO in Section AD11.3.13 ‘Airport Effects Overlays’.
Chapter 5 - District Wide Attachment A3	Amend provisions to: <ol style="list-style-type: none"> 1. Increase clarity as to the role and function of Nelson Airport as nationally and regionally significant infrastructure, and amendments to Objective DO11.1 Airport Transport and associated policies (amendments to DO11.1.1, DO11.1.2, DO11.1.3 and DO11.1.5 and deletion of DO11.1.4) as to enablement of the Airport efficiently and effectively to recognise its contribution to economic and social wellbeing, and that aircraft operations are managed, as well as being protected from reverse sensitivity effects. 2. Insert within DO15.1 requirements to manage effects associated with reverse sensitivity effects on nationally and regionally significant infrastructure, including amendments to Objective DO15.1 and Policy DO15.1.1. 3. Insert text references to ‘Airport Zone’ within DO16.1 Management of Resources by location.
Chapter 7 – Residential Zone	Amendments including to: <ol style="list-style-type: none"> 1. Policy RE1.1 to provide criteria accounting for the ‘efficient and effective operation of infrastructure’ in managing residential density. 2. The explanation for Policy RE1.4 referencing ASAN.

Attachment A4 (Objectives and Policies) and Attachment A5 (Rules)	<ol style="list-style-type: none"> 3. REr.64 to extend constraints on minimum site area to the ANB. 4. REr.65 to preclude as non-complying new ASAN within the AECO, and require acoustic insulation and ventilation for existing lawfully established buildings seeking replacement or substantial alteration. 5. Insert Rule REr.65A to preclude as prohibited activities new ASAN within the ANB, and otherwise require acoustic insulation and ventilation for existing lawfully established buildings seeking replacement or substantial alteration.
Chapter 9 – Suburban Commercial Zone Attachment A6	<p>Insert:</p> <ol style="list-style-type: none"> 1. Rule SCr.71 to preclude as non-complying new ASAN within the AECO, and require acoustic insulation and ventilation for existing lawfully established buildings seeking replacement or substantial alteration. 2. Rule SCr.71A to preclude as Prohibited Activities new ASAN within the ANB, and otherwise require acoustic insulation and ventilation for existing lawfully established buildings seeking replacement or substantial alteration.
Chapter 10 – Industrial Zone Attachment A7 (Objectives and Policies) and Attachment A8 (Rules)	<p>Delete:</p> <ol style="list-style-type: none"> 1. Redundant Industrial Zone provisions related to the Airport (including IN1.4). <p>Amendments to provide a Region wide consistent approach to the management of ASAN including through:</p> <ol style="list-style-type: none"> 1. INr.20 to preclude new residential units within the AECO (non-complying) and ANB (Prohibited). 2. INr.67 to preclude as non-complying new ASAN within the AECO, and require acoustic insulation and ventilation for existing lawfully established buildings seeking replacement or substantial amendment. 3. Insertion of Rule INr.67A to preclude as prohibited new ASAN within the ANB, and otherwise require acoustic insulation and ventilation for the replacement or substantial alterations of existing lawfully established buildings.
Chapter 11 – Open Space Attachment A9 (Objectives and Policies) and Attachment A10 (Rules)	<p>Amendments to provide a Region wide consistent approach to the management of ASAN including through:</p> <ol style="list-style-type: none"> 1. Schedule Oss.7 Camping Grounds to ensure that Camping or short-term living accommodation within the AECO and ANB is managed, including prohibiting the construction of new ASAN within the ANB. 2. OSr.23 is amended such that caretaker accommodation within the AECO is deemed a non-complying activity, and within the ANB is prohibited. 3. OSr.53 is amended to preclude as non-complying new ASAN within the AECO, and require acoustic insulation

	<p>and ventilation for existing lawfully established buildings seeking replacement or substantial alteration.</p> <p>4. Insertion of Rule OSr.53A to preclude as prohibited activities new ASAN within the ANB, and otherwise require acoustic insulation and ventilation for existing lawfully established buildings seeking replacement or substantial amendment.</p>
<p>Chapter 14 – Conservation Zone</p> <p>Attachment A11</p>	<p>Amendments to :</p> <p>1. Rule Cor.21 to preclude the establishment of new Buildings for ASAN within the AECO (non-complying) or ANB (prohibited).</p>
<p>Chapter 15 – Airport Zone</p> <p>Attachment A12 (Objectives and Policies) and Attachment A13 (Rules)</p>	<p>Establishing <u>Chapter 15 ‘Airport Zone’</u>, including through:</p> <p>1. Establishing a cohesive framework (objectives, policies and rules) in relation to the management of activities within the Airport Zone, including:</p> <ul style="list-style-type: none"> i. Rules relating to activities. ii. Rules relating to Built Form and environmental effects. iii. Rules relating to region wide overlays, including the coastal environment and building on low lying sites. iv. Rules relating to Subdivision.
<p>Appendix 1 – Heritage Buildings, places and objects</p>	<p>Amendments to the Scheduled Sites and Planning Maps in the NRMP to accurately refer to Hangar 2 as a "Group B" Heritage item.</p>
<p>Appendix 19 – Acoustic Insulation Requirements</p> <p>Attachment A14</p>	<p>Amendments to the existing requirements for acoustic insulation requirements associated with the AECO and inclusion of the updated FANC.</p>

3 Report structure

This report is set out in a format to account for the required information and statutory tests for both the PPC and NoR under the relevant provisions of the RMA. There are areas of reporting common under both statutory processes, and hence a combined report is considered appropriate and useful to provide overall context and understanding of the resource management issues.

Unless expressly provided, the sections of this report supports both the PPC request and the NoR to NCC.

This report is structured as follows:

- Section 4 describes the background and context relevant to the NoR and PC proposal.
- Section 5 describes the site, operative resource management framework and the surrounding environment for the NoR and PPC proposal.
- Section 6 sets out a description of the NoR, including the Requiring Authority's (NAL's) objectives for requiring the designations and the nature of the designations.
- Section 7 sets out a description of the PPC proposal.
- Section 8 identifies the statutory frameworks that are applicable to the consideration of the NoR and PPC proposals.
- Section 9 sets out the process and analysis for the NoR relevant to the consideration of other alternative sites or routes for undertaking the work
- Section 10 comprises an assessment of effects on the environment (**AEE**) for the NoR and PPC.
- Section 11 provides an assessment of the NoR and PPC proposals against the relevant planning framework.
- Section 12 provides a summary of the consultation undertaken in respect of the NoR and PPC.
- Sections 13 sets out the assessments against the relevant provisions of the RMA for the NoR, including the reasonable necessity of the designations, and commentary on any other relevant matters for consideration in accordance with the requirements of s171 of the RMA.
- Sections 14 and 15 set out the section 32 evaluation reporting required for the PPC proposal.
- Section 16 sets out the Part 2 assessment for both the PPC and NoR, and conclusions.

A number of attachments are also provided in support of the NoR and PCC. These provide a comprehensive appraisal of the actual or potential environmental effects of the designation and Airport Zone. A full list of attachments is set out above in the Index.

4 Background and context

4.1 Plan framework context

The NRMP was made operative on 1 September 2004.

In November 2013, NCC embarked on a comprehensive review of its Operative Regional Policy Statement, the NRMP and the Nelson Air Quality Plan. That review was to result in a new plan called the Whakamahere Whakatū Nelson Plan.

NAL and its representatives worked with NCC to consider a more appropriate resource management framework associated with Airport resources, growth and management, and for that framework to be included in the Draft Whakamahere Whakatū Nelson Plan.

That framework was to include both the formation of an Airport Zone and amended Designations to account for an extension to NAL's existing main runway.

In December 2021 NCC decided to pause its preparation of the Whakamahere Whakatū Nelson Plan on the basis of the Government's proposed legislative changes to the RMA framework.

Accordingly, NAL decided that it would seek to pursue (through its own PPC and NoR), the more comprehensive and contemporary resource management framework that was to be established through the Whakamahere Whakatū Nelson Plan.

This NoR and PPC represents that package in providing for more appropriate recognition of the Airport resources and growth management than that included in the 2004 Operative NRMP. This report also assesses alternatives process pursuant to section 171(1)(b) of the RMA to test the options for the NoR in that context.

4.2 Nelson Airport operations and context

NAL is an airport company pursuant to section 3 of the Airport Authorities Act 1996. It is also a Council Controlled Trading Organisation (CCTO) under section 6 of the Local Government Act 2002. NAL has a statutory obligation to conduct its commercial affairs in a manner that maximises long term sustainable returns for its shareholders – NCC and Tasman District Council. Pursuant to section 4(3) of the Airport Authorities Act 1966, NAL is required to operate Nelson Airport as a commercial undertaking. An appropriate planning framework is therefore needed to enable NAL to operate in this manner.

Nelson Airport is a key strategic gateway that enables air travel, connectivity and freight transport, serving around 104,000 residents in the Nelson-Tasman region. The Airport is one of New Zealand's busiest regional airports. Compared to many other New Zealand airports, Nelson Airport is well served by airlines, including frequent domestic services between Nelson and major metropolitan areas such as Auckland, Wellington, and Christchurch, as well as onward to many international destinations for outbound and inbound passengers. Other smaller point-to-point destinations served include Hawke's Bay, Palmerston North and Hamilton. The Airport accommodates a variety of turboprop aircraft, including the ATR 72-600, Bombardier Q300 and Cessna Caravan, Pilatus PC12, and Jetstream J32.

Nelson Airport is situated on a coastal site of approximately 129 hectares, approximately 8 kilometres from Nelson's city centre, and provides an operational sealed main runway of 1,347m in length, and two grass runways. However, NAL's existing main runway is among the shortest in the world catering for the types of aircraft it services. The current runway length leads to payload restrictions for turboprop aircraft using the Airport. Under certain weather conditions, passenger and freight capacity is limited, impacting reliability for travellers,

businesses and their customers. Air New Zealand and Originair have confirmed a longer runway would remove those restrictions.

Significant effort is being expended globally in the development of sustainably powered aircraft to reduce reliance on fossil fuels – such aircraft are expected to be powered by batteries, hydrogen, and or sustainable aviation fuels. There are still many challenges to overcome including aircraft performance and incorporating new technology into larger aircraft. The current focus in aircraft development is on fuel efficiency and sustainable alternatives to fossil fuels rather than optimising aircraft performance for short runways, such as at Nelson Airport.

NAL has signalled the need for a longer runway for many years through its annual reports, master plan and other public documents to resolve constraints and impediments associated with the current runway configuration. NAL has determined that an extended runway is the best way for Nelson Airport to prepare for next generation aircraft.

The amendments sought through the NoR and PPC provide a comprehensive package to enable aircraft operations on a longer runway and manage the resultant noise exposure and obstacles (such as masts, tall chimneys and trees) that could limit the Airport's ability to operate in future.

4.3 Nelson Airport's Master Plan 2050

Due to the nature of airport infrastructure and the significant capital investment required to develop that infrastructure, long-term planning is critical to the development of airports. As such, airports undertake long-term planning exercises, known as master planning. Master Plans are a strategic planning document and delivery tool developed by airport operators. Master Plans set the context within which individual projects are conceived and delivered to achieve the best outcomes, and are typically high-level documents that cover a wide range of spatial scales and timescales (typically around a 30-year lifespan).

In order to ensure that it can meet the projected levels of demand in a coordinated and efficient manner, NAL regularly reviews and updates its master plan.

NAL's most recent Master Plan 2050 (attached as **Attachment E**) includes Nelson Airport's forecast future activity levels out to 2050 and outlines the need for the Airport to extend its existing main runway to provide for current and future aircraft types and improved safety facilities. The Master Plan also notes that the extension will ensure the future Airport operations are not unduly constrained by development or intensification occurring near the Airport.

The 2050 Master Plan identifies that globally, significant effort is being expended to develop sustainably powered aircraft, such as battery-powered, hydrogen-powered and sustainable aviation fuels-powered aircraft. It is expected that the shift towards sustainability within the aviation industry will result in the next generation of aircraft, that replace aircraft currently operating at Nelson Airport, will require a longer runway than that currently available at Nelson. The 2050 Master Plan acknowledges that in light of these developments in technology and industry direction, that an extended runway is the best way for Nelson Airport to prepare for the future.

Additionally, to provide for the safe operation of aircraft, the 2050 Master Plan recognises the need to provision RESA, for reducing the risk of damage to aircraft in the event of an undershoot, overshoot or excursion from the runway. With any increase of more than 15m in the length of the main runway at Nelson Airport, a requirement for RESA would be triggered. The 2050 Master Plan incorporates all those aspects in planning for Nelson Airport's runway extension.

5 Site and Surrounds

5.1 Site History

An in-depth history of the Nelson Airport site is provided for within the Archaeological Assessment (**Attachment G1⁴**).

In summary, the coastal area of the Waimea Inlet was of great importance to local Māori as a means of both transport and mahinga kai. The area is believed to have been settled over 600 years ago with successive tribes making their camps and settlements on the coast and islands. To the north of the project area, in Tāhunanui, one of the oldest camps was located near the junction of what is today Bisley Avenue and Rocks Road. This advantageous position provided ready access to kaimoana in the Waimea Inlet and the open waters of Te Tai-o-Aorere (Tasman Bay). The site also provided ready access to quantities of flax to the south in what is now Stoke, and its proximity to the important trading site of Matangi Āwhio to the north made it an important site for local iwi (Bell, 2021).

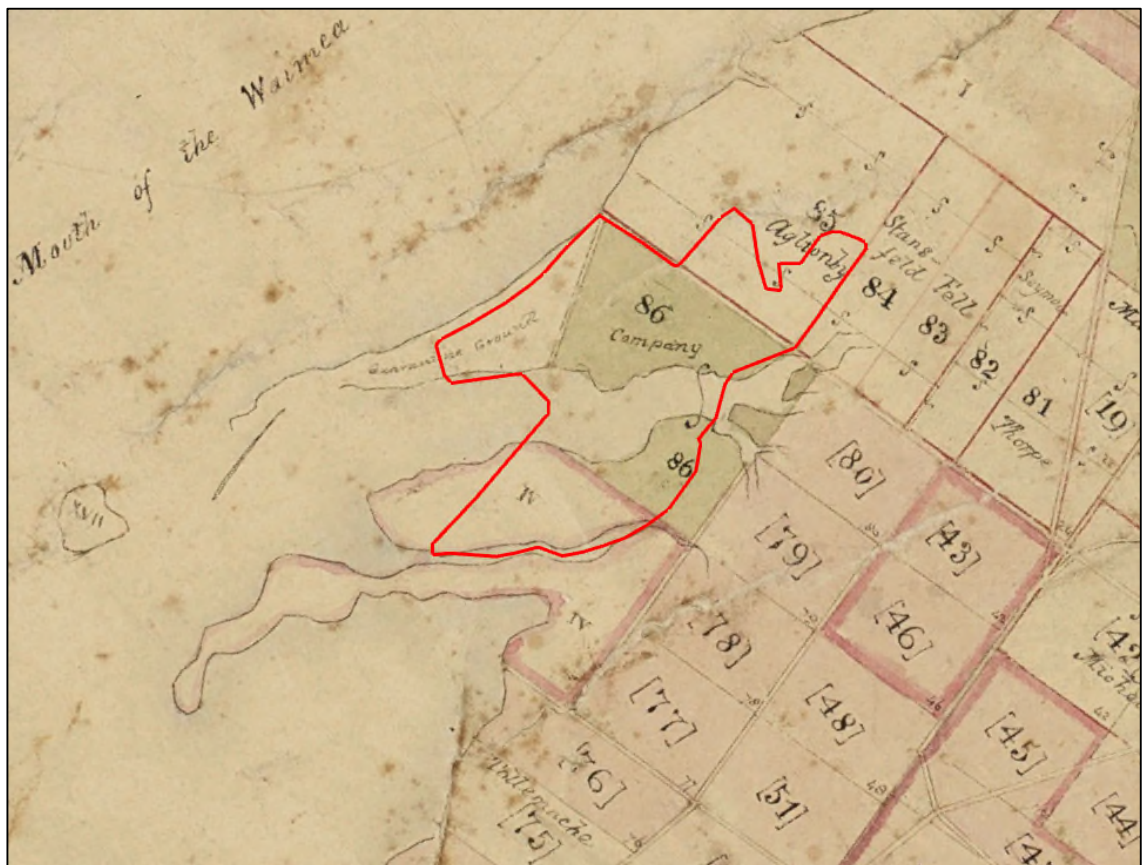


Figure 2: Detail from an 1847 map of the Nelson Suburban Sections, showing the approximate boundaries of the current Nelson Airport designation (outlined in red). Image: Archives New Zealand, 1847. **Attachment G1 Underground Overground.**

The site is part of the Nelson Airport property as first surveyed as part of Sections IV, 85, 86 and the Quarantine reserve which would later be known as Section 34 (below). The Nelson Airport

⁴ **Attachment G1.** Underground Overground.

property was surveyed as part of Sections IV and 86, and the history of these two land parcels is outlined below. The subject site is located on Section IV.

It is likely that Sections 86 and IV were utilised for agricultural pursuits. Alfred Gordon Field purchased Section IV and Section 86 from the Public Trustee in 1934 (LINZ, 1924). In 1937 Proclamation 1037 set aside 38 acres of Field's land as part of the Nelson Aerodrome site (LINZ, 1924). As part of the works the area of the Waimea Inlet's tidal flats were reclaimed to provide the solid ground required for the airport's runway and to ensure that the sea did not undermine the sides of the runway (Nelson Evening Mail, 4/11/1937: 6), including the edges of Jenkins Creek (**Figures below**). Much of Jenkins Creek edge and embankments were substantially formed through reclamation and recontouring during that period between 1924 and 1937. The Nelson Aerodrome was officially opened by Public Works Minister R. Semple in October 1938.

Section 85 (where Nelson Golf Club is located) was purchased off Edward Green (who purchased Section 85 from Lance and Armstrong in 1862) and it has been part of the Golf Club since 1906, except for that parcel fronting the corner of Quarantine Road and Bolt Road which was acquired by the Government in 1942 for defence purposes, and extended five years later.



Figure 3: Aerial imagery from 1948 showing the development of the Nelson Airport site at that time. Image: LINZ, 1948. **Attachment G1 Underground Overground.**



Figure 4: Aerial imagery from 1948 showing the development of the Nelson Airport site at that time. Image: LINZ, 1948. Aerial imagery from 1942 showing the development of the Nelson Airport site at that time including reclamation and contouring at Jenkins Creek into the Waimea Inlet. **Attachment G1 Underground Overground.**

5.2 Description of the Airport Environment

5.2.1 Overview

The following provides a description of the human, natural and physical aspects of the existing environment within which the NoR and PPC will be constructed and operated.

The potential effects of the project on this environment, and measures to mitigate or otherwise manage these effects are set out in section 10 to this report.

The term ‘environment’ is defined in section 2 of the of the RMA, and the existing environment comprises of all the factors listed, both as they occur naturally and where lawfully established. The existing environment should also countenance the likely future state of the environment as it may be modified by activities permitted by the NRMP.

5.2.2 Regional Context and Economy

Nelson Airport is a regional airport located at the top of the South Island, south-west of the Nelson city centre. It is equally close to the Nelson City Centre and Richmond, the main population centres in the Nelson Tasman region.

Through Air New Zealand, Nelson Airport has direct links with the cities of Auckland, Wellington, and Christchurch. Other carriers including Originair, Sounds Air, and Golden Bay Air provide direct provincial links to the North Island cities of Paraparaumu, New Plymouth, and Palmerston North, as well as short hops to “local” destinations, Takaka and Karamea, in the north of the South Island.

The economic contribution of Nelson Airport can be considered in three groups:

- Airport and Precinct – operational and capital expenditure and employment by the Airport and airport associated companies including airport services, air services, air-related services, aircraft servicing, and maintenance and visitor services.
- Tourism and Trade – expenditure and employment associated with visitors in the Nelson-Tasman region enabled by the Airport.
- Catalytic – Business and population growth and productivity enabled by the Airport.

Based on the 2018 financial year, *‘Nelson Airport was indirectly responsible for about 15% of all visitor expenditure in the Nelson Tasman region which accounted for 3.37% of the region’s GDP’*. Total direct economic impact of Nelson Airport is estimated at \$95million in GDP and some 1,714 FTEs. Adding induced (multiplier) impacts, this rises to a contribution of \$178million to the Nelson Tasman economy and some 3,091 FTEs.⁵

5.2.3 Natural and Physical Environment

The Airport and the immediate surrounding area are relatively low lying (approximately 5m above sea level), including Monaco Peninsula and the undulating coastal lands of the Nelson Golf Club. The current airport site is flat to gently sloping, with the elevations ranging from 3.5m at the northernmost point of the runway to 2.5m at the southernmost point of the runway. The ground surface generally slopes towards the estuary west of the runway.

Due to Airport infrastructure, buildings, services and operations, the natural ground surface has been significantly altered and modified by earthworks and reclamation and is notably open and covered in low stature exotic grasslands as required for safety measures and easy maintenance.

Airport infrastructure and structures including the main paved Airport runway are located centrally within the existing designations for the Airport, the Airport terminal building, carpark and industrial buildings (airport hangers and large sheds) and associated with airport activity are located east of the main runway on Trent Drive, Rapide Place, Tangmere Place, Dakota Street and McLaren Drive.

In terms of landscape, the Airport and landholdings represents a largely modified environment. The coastal waters and edges of the Waimea Estuary that delineate the Airport are recognised in the NRMP by way of a Landscape Overlay, Marine ASCV overlay and Riparian and Coastal Margin Overlay. However, the Airport (and associated landholdings) are not identified in the NRMP as an Outstanding Natural Feature / Landscape or area of Outstanding Natural Character at the Regional or District scale.

In terms of ecological values, vegetation and terrestrial habitats are highly modified and comprised of exotic plant species of generally negligible ecological value. However, the margins with Jenkins Creek and the Waimea Estuary represent important ecological habitats.

⁵ Attachment L. Martin Jenkins [pg 8, Table 4].

5.2.4 Human Environment

There are no Heritage New Zealand Pouhere Taonga's (HNZPT) New Zealand Heritage List/Rārangi Kōrero places / areas or New Zealand Archaeological Association (NZAA) recorded archaeological sites located within the proposed altered designation extent for DAA1. The NRMP identifies Hangar 2 as a Group B Notated Heritage Building as listed as 'Trent Drive – 1943, Air Nelson Hangar, Bldg'. Hangar 1 and Hangar 3 have been deconstructed and are no longer listed in the Schedule in APP1 of the NRMP but erroneously remain on the Planning Maps.

The area subject to the NoR for DAA1 is not identified in the NRMP or by mana whenua as one possessing specific cultural or historic heritage values or features. However, the Archaeological and Heritage Assessment undertaken for the project identifies that the coastal area of the Waimea Inlet was of great importance to local Māori as a means of both transport and collecting mahinga kai, and that north of the Site in Tāhunanui, one of the oldest camps was located near the junction of what is today Bisley Avenue and Rocks Road⁶.

In terms of land-use, the site fronting Trent Drive and Bolt Road is occupied by Nelson Airport and development and operations associated with airport services, air services, air-related services, aircraft servicing, and maintenance and visitor services, including associated connecting roads and supporting carparking. This includes substantial structures associated with the contemporary Airport Terminal and Tower. A large stormwater basin occupies part of that area between Trent Drive, Tangmere Place and Rapide Place. The nature of the environment is heavily influenced by the working nature of the operational airport, including noise exposure from Aircraft Operations and buildings and structures associated with Aviation Activities.

In terms of the western operational area of the Airport, this is occupied by the main sealed runway and associated taxiways, as well as two grass runways. The remainder of this area is generally grasses and exotic plant species. Several revetment structures exist at the interface with Jenkins Creek and Waimea Estuary.

In terms of noise exposure, the NRMP and operative Designation DAA2 establishes a framework associated with noise exposure from Aircraft Operations which extends over Residential zoned areas to the north, east, and south of the Airport. The number of houses in each of the noise contour bands contained and provided for within the Operative NRMP are identified in **Figure 5** below.

Noise Level (dB L _{dn})	Number of Dwellings - Operative NRMP
55-59	707
60-64	300
65-69	16
Total	1023

Figure 5: Number of Dwellings subject to Operative NRMP Airport Operation Noise Exposure. **Attachment K2** (Table 4).

⁶ **Attachment G1.** Underground Overground [5].

Aircraft Engine Testing, which consists of on-wing engine testing as part of Nelson Airport's maintenance activities is the subject of specific provisions in the NRMP⁷ which control noise received at residential boundaries, including an eight-hour averaging period for noise measurement.

Nelson Airport also undertakes Compass Swings as part of its maintenance activities. Compass Swings are necessary to calibrate an aircraft's compass and are subject to specific operational requirements. Compass Swings are an existing activity at Nelson Airport that has not been expressly regulated in terms of noise or other operating limits through the NRMP. The activity is relatively infrequent and of limited duration but can result in adverse effects associated with noise exposure on adjoining residential areas.

5.3 Surrounding Environment

Nelson Airport and surrounding area is located centrally between Nelson and Richmond, being some 8km south-west from the Nelson City Centre and 9km north-east of the Richmond town Centre. The existing Nelson Airport is bounded by the edge of the Waimea Inlet to the southwest, with the southern edge bounded by Jenkins Creek which flows westward into Waimea Inlet and associated tidal flats.

The broader environment context includes Moturoa/Rabbit Island, Bell Island and Best Island to the west. The coastal waters of Waimea Inlet and specifically Blind Channel which separates the Airport from Rabbit Island. Further north is Te Tai-o-Aorere/Tasman Bay and the coastal suburb of Tāhunanui. The Annesbrook industrial area is located east of the Airport and extends to State Highway 6. The Tāhunanui Port Hills and more distant Barnicoat Range act as an elevated backdrop east of the Airport. The Wharepapa/Arthur Range within Kahurangi National Park are visible west of the Airport in the distance, beyond the Waimea Estuary.

Residential communities proximate to the Airport include Monaco as located to the south on a peninsula landform that extends into Waimea Estuary, and Tāhunanui to the north extending up to Tāhunanui Beach to the north. Further to the east are the communities of Stoke and Annesbrook and Whakatu as separated from the Airport by the Annesbrook industrial area.

The roading network supporting the Airport is via the private NAL operated road of Trent Drive. Trent Drive connects with the external roading network at Quarantine Road (a Principal Road), which in turn connects with State Highway 6, which provides a primary route between Nelson CBD and Richmond. Other roads in the immediate vicinity also support access to the Airport, including via Bolt Road and Parkers Road.

There are several pedestrian and cycle access tracks within close proximity to the Airport. Namely, a pedestrian walkway follows the entire perimeter of the Airport (Airport Perimeter Walk) which also links to the Airport Peninsula Walk south-west of the Airport. A walking/cycle track also follows Jenkins Creek and loops around Monaco Peninsula south of the Airport. State Highway 6, Whakatu Drive, are located southeast of the Airport and provides the main transport link between Nelson and Richmond.

⁷ NRMP Operative Rule INr.25.

5.4 DAA1 – Site description and ownership

The site subject to the altered DAA1 consists of:

1. The land contained within the operative Designation DAA1 extent, being:
 - 2, 4 and 111 Trent Drive Nelson, being Lot 1 DP 19886 and Section 114 Suburban South District, being 113.6946ha, and Part Section 85 and Part Section 111 District of Suburban South (0.5169ha) under the ownership of NCC;
 - 40 to 62 Point Road, Monaco, being Lots 1 to 10 DP18321 (1.2121ha) and Lots 1 to 5 DP18320 (0.9297ha) under the ownership of NAL.
2. The land proposed to be included in altered Designation DAA1, to enable the extension to NAL's existing runway, being:
 - Section 111 District of Suburban South (1.5049ha), Lot 2, 4 Deposited Plan 472101 and Lot 15 Deposited Plan 14442 and Lot 2 Deposited Plan 17638 (11.1522ha), Lot 2, 4 Deposited Plan 472101 and Lot 15 Deposited Plan 14442 and Lot 2 Deposited Plan 17638 (4.2700ha), Lot 2 Deposited Plan 493143 (34.0800ha), and Lot 3 DP 472101 (0.2229ha) for a total area of 15.15ha, under the ownership of Nelson Golf Club Incorporated. As addressed as 36 and 68 Bolt Road; and
 - Lot 2 Deposited Plan 409237 (1.0736ha) under the ownership of NAL, and as addressed as 9 Awatea Place, Bolt Road; and
 - Section 1 SO 301599 (1.9079ha) Whakatu Drive, and Pt Section 86 Suburban South District (0.3389ha) Seaview Road, under the ownership of NAL.

The land subject to the operative DAA1 and the NoR for DAA1 is shown on **Figure 6** below (**Site**). The green line shows the proposed designation extent for Designation DAA1 and the red hatched area shows the existing operational extent of DAA1 in the NRMP.

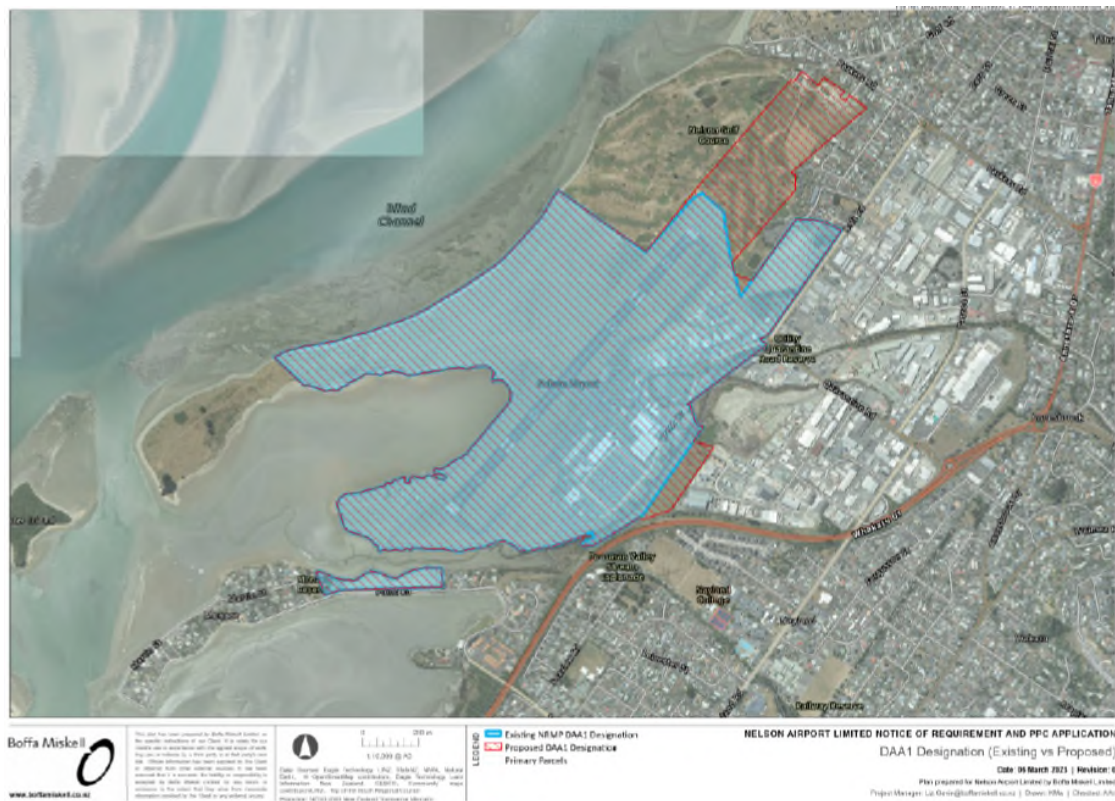


Figure 6: Location Plan – Proposed Designation DAA1 outlined in Green and existing Designation DAA1 in red cross hatch

5.4.1 Site ownership – DAA1

The legal descriptions and landowners of the Site are set out in the table included in Table 1 and identified in **Attachment B5**.

Table 1: Legal Descriptions and Landowners – DAA1

Operative NRMP Designation DAA1				
Address	Legal Description	Area of title	CT Reference	Ownership
2, 4 and 111 Trent Drive Nelson	Lot 1 Deposited Plan 19886 and Section 114 Suburban South District	113.6946ha	NL13B/222	Nelson City Council
	Part Section 85	4,471m ²	NL12A/818	Nelson City Council
	Pt Section 114 Suburban South District	698m ²	NL12A/818	Nelson City Council
40 Point Road	Lot 1 DP 18321	610 m ²	NL12A/1270	Nelson Airport Limited
41 Point Road	Lot 2 DP 18321	1,175 m ²	NL12A/1277	Nelson Airport Limited

43 Point Road	Lot 3 DP 18321	2,644 m ²	NL12A/1267	Nelson Airport Limited
45 Point Road	Lot 4 DP 18321	1,192 m ²	NL12A/1276	Nelson Airport Limited
46 Point Road	Lot 5 DP 18321	1,100 m ²	NL12A/1269	Nelson Airport Limited
47 Point Road	Lot 6 DP 18321	1,765 m ²	NL12A/1266	Nelson Airport Limited
49 Point Road	Lot 7 DP 18321	845 m ²	NL12A/1274	Nelson Airport Limited
50 Point Road	Lot 8 DP 18321	919 m ²	NL12A/1275	Nelson Airport Limited
51 Point Road	Lot 9 DP 18321	932 m ²	NL12A/1273	Nelson Airport Limited
52 Point Road	Lot 10 DP 18321	940 m ²	NL12A/1265	Nelson Airport Limited
55 Point Road	Lot 1 DP 18320	1,311 m ²	NL12A/1268	Nelson Airport Limited
56 Point Road	Lot 2 DP 18320	636 m ²	NL12A/1272	Nelson Airport Limited
57 Point Road	Lot 3 DP 18320	1,573 m ²	NL12A/1271	Nelson Airport Limited
60 Point Road	Lot 4 DP 18320	1,333 m ²	NL12A/1263	Nelson Airport Limited
62 Point Road	Lot 5 DP 18320	4,446 m ²	NL12A/1264	Nelson Airport Limited

Designation DAA1 - Extension				
Address	Legal Description	Area of title	CT Reference	Ownership
No address	Lot 3 DP472101	2,230 m ² *	642656	Nelson City Council
36 Bolt Road	Pt Section 111 District of Suburban South	8,676 m ² *	NL115/242	Nelson Golf Club Inc
	Lot 2 DP 472101	6.8377 ha*	642657	Nelson Golf Club Inc
	Lot 2 DP 17638	11.1522ha*	642657	Nelson Golf Club Inc
	Lot 2, 4 DP 472101		642657	Nelson Golf Club Inc
	Lot 2 DP 17638	4.2700 ha*	642657	Nelson Golf Club Inc
	Lot 2 DP 493143	34.080 ha*	719581	Nelson Golf Club Inc
* Total extent required for Designation DAA1 across titles		15.15ha		Nelson City Council / Nelson Golf Club

9 Awatea Place	Lot 2 DP 409237	1.0736 ha	433838	Nelson Airport Limited
Whakatu Drive	Section 1 SO 301599	1.9079ha	145635	Nelson Airport Limited
Seaview Road	Pt Section 86 Suburban South District	0.3389ha	11801	Nelson Airport Limited

5.4.2 Site description – DAA1

That land subject to Designation DAA1 under the operative NRMP contains activities and facilities as associated with aviation and airport activities, including runways, taxiways, terminals and ancillary commercial and industrial activities, as well as supporting infrastructure and services such as roading.

The area is predominantly open and covered in grasslands as required for safety measures (OLS and bird strike risk) and maintenance.

Nelson Airport is configured with three runways. The main sealed runway (identified as Main Runway 02-20) at 45 metres wide as paved and located centrally. Two grass runways, being identified as Grass Runway 02-20 (584 metres long by 48 metres wide) and a second grass runway (diagonal to the other two runways, identified as Grass Runway 06-24 at 526 metres long by 24 metres wide).

The Airport terminal building, carpark and industrial buildings (airport hangers and large sheds) associated with airport activity are located east of the main runway on Trent Drive, Dakota Street, Rapide Place, Tangmere Place, Bolt Road and McLaren Drive.

The part of the Site currently not designated under the operative NRMP is occupied by Nelson Golf Club, as well as three parcels owned by NAL including 9 Awatea Place and two parcels on the eastern side of Jenkins Creek.

The topography is relatively flat with a mix of undulating and rolling landform which is largely in grassland and generally devoid of mature trees. The NoR extends to that area currently occupied by a number (1, 9, 10 and 18) of golf holes as a component of the Nelson Golf Links owned and operated by the Golf Club. A collection of buildings used by the Golf Club (caretakers) are located at the north-west corner of the extension area which is accessed via Parkers Road. Directly north and east of the extension area is Maire Stream which flows into Waimea Inlet, residential dwellings and the Nelson Golf Clubhouse with associated carpark.

As shown on **Figure 6** the part of the Site included with the extended Designation DAA1 is clear of any built form or structures.

5.4.3 Site Zoning – DAA1

The land within the current designation DAA1 and proposed extended designation extent falls within the Industrial Zone and Open Space and Recreation Zone, except for 9 Awatea Place as accessed from Parkers Road which is zoned Residential (but has not been developed). The part of the land requirement adjoining Point Road is currently zoned Open Space and Recreation Zone, as is the area of the Site that is currently occupied by the Nelson Golf Club (refer Figure 3 below).

There are no protected trees across the Site. Scheduled Sites in the NRMP are limited to Hangar 2 which dates to 1943. This is scheduled as a Group B heritage item on the NRMP schedule of heritage items (APP1).

There are a number of overlays that extend across all or part of the Site, including:

- 'Coastal Environment Overlay' over those parts of the Site zoned Open Space and Recreation Zone.
- 'Riparian Overlay Coastline' and Coastal Marine Area (**CMA**) boundary at Waimea Inlet and extending some distance up Jenkins Creek.
- 'Inundation Overlay' over much of the Site, including the existing Designation DAA1.

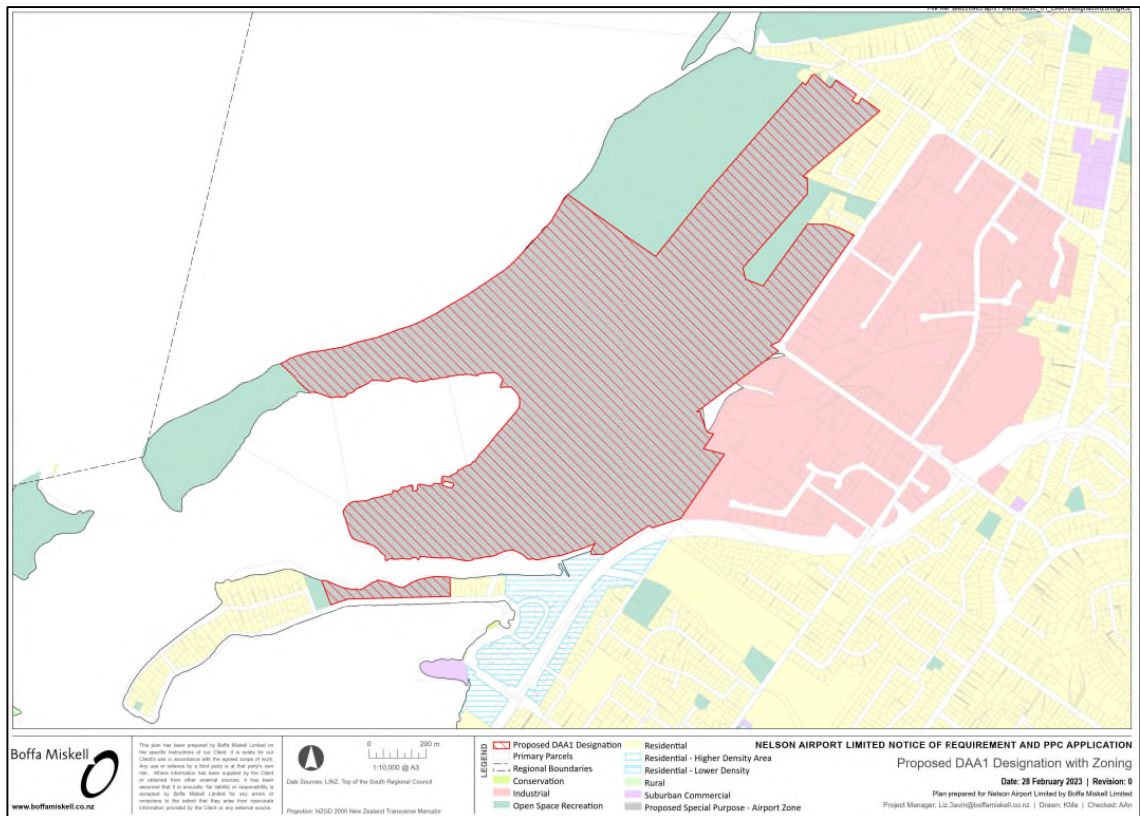


Figure 7: DAA1 - NRMP Zoning

5.5 DAA2 – Site description and ownership

Those properties subject to the NoR for DAA2, and the AECO are shown on Figure 8.

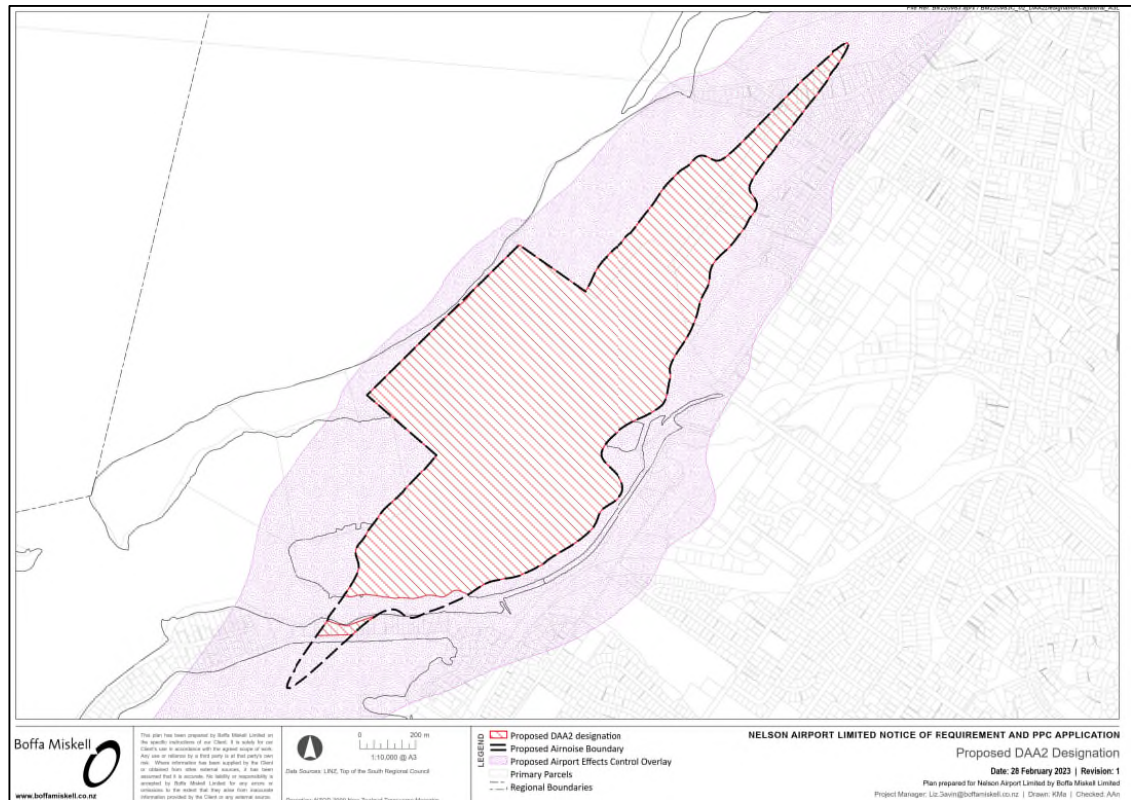


Figure 8: Designation DAA2 Airnoise Boundary Extent

5.5.1 Site ownership – DAA2

The legal descriptions and landowners of properties subject to Designation DAA2 are set out in the table included in **Attachment B6** to this report.

5.5.2 Site description – DAA2

That land subject to Designation DAA2 under the operative NRMP, as inclusive of the Airport land and infrastructure as described in Section 5.4.2 above, also includes part of that area occupied and owned by Nelson Golf Club, and residentially zoned properties and development north of the main runway, including those with access off Parkers Road and Golf Road, as well as part of the Tahuna Beach Holiday Park and Motel complex including a number of existing buildings used for Short Term Living Accommodation.

To the south, the ANB is reduced from that contained in the Operative NRMP, with the Requirement reducing the scale of Designation DAA2 on residential properties adjoining Point Road.

5.5.3 Site Zoning – DAA2

The NoR largely falls within the Industrial Zone and Open Space and Recreation Zone under the NRMP, in relation to the Airport and Nelson Golf Club. Residentially zoned properties subject to the NoR include 9 Awatea Place (as owned by NAL) and a number of properties with access to Parkers Road and Golf Road.

Designation DAA2 also encroaches into the Open Space and Recreation Zone associated with Tahuna Beach Holiday Park as Scheduled as 'Tāhunanui Motor Camp'.

The respective underlying zoning in the Operative NRMP is shown in Figure 9.

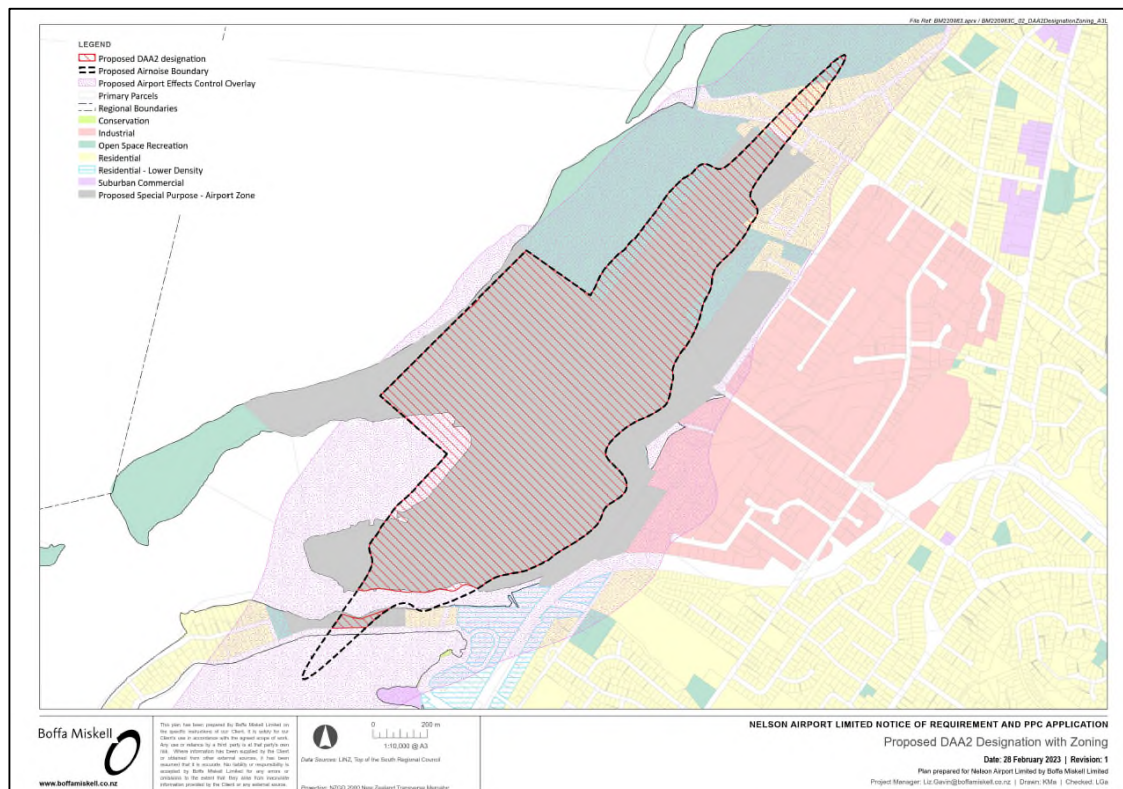
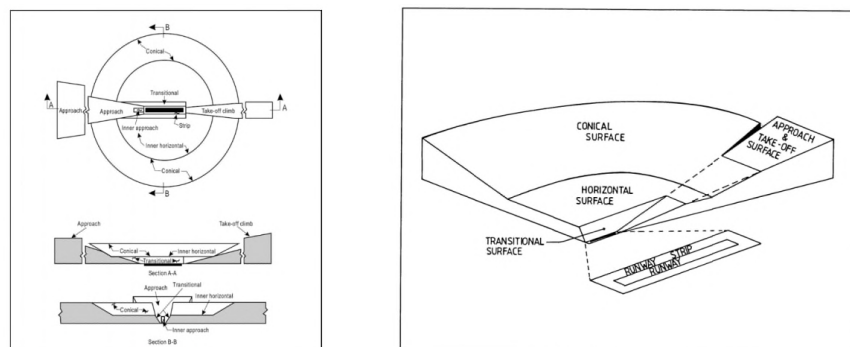


Figure 9: DAA2 - NRMP Zoning

5.6 DAA3 –Description and spatial extent

OLS are a set of spatially defined surfaces associated with the operations of an aerodrome's runway system. They define the volume of airspace that should be kept free from obstacles to minimise the danger to aircraft during an entirely visual approach or during the final visual segment of an instrument approach procedure. These surfaces are based on the location and height of the airport reference datum and associated runways. Anything protruding above the vertical limits of the OLS is regarded as an obstacle.

The requirement for OLS stems from CAA AC-139, with the limitation surfaces as generally illustrated below:



Sources: CAANZ AC139-6

Those properties subject to the NoR for DAA3 as this relates to the OLS are shown in Figure 10.

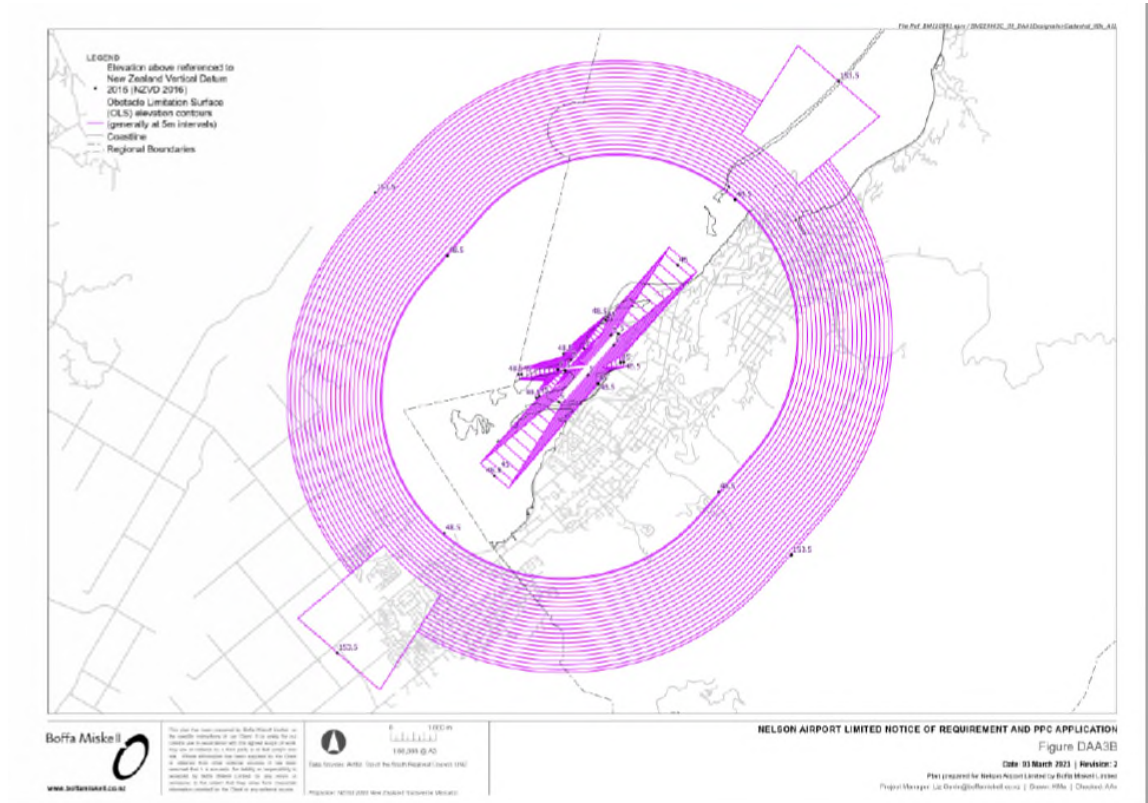


Figure 10: DAA3 OLS Extent

5.6.1 Site description and zoning – DAA3

Requirements associated with Designation DAA3 fall on a substantial area to the north and east of the Airport, including Stoke and Tāhunanui, Nelson Port and Nelson CBD, as well as the ridgeline along Princes Drive and Stepneyville. For those areas proximate to Nelson Airport, the respective zoning and obstacle limitation contour (thresholds generally in 5m intervals) is provided in Figure 11.

The full specifications for the OLS associated with both the main runway and each grass runway is provided in DAA3.3. The schedule of properties to which DAA3 relates is provided in **Attachment B7**.

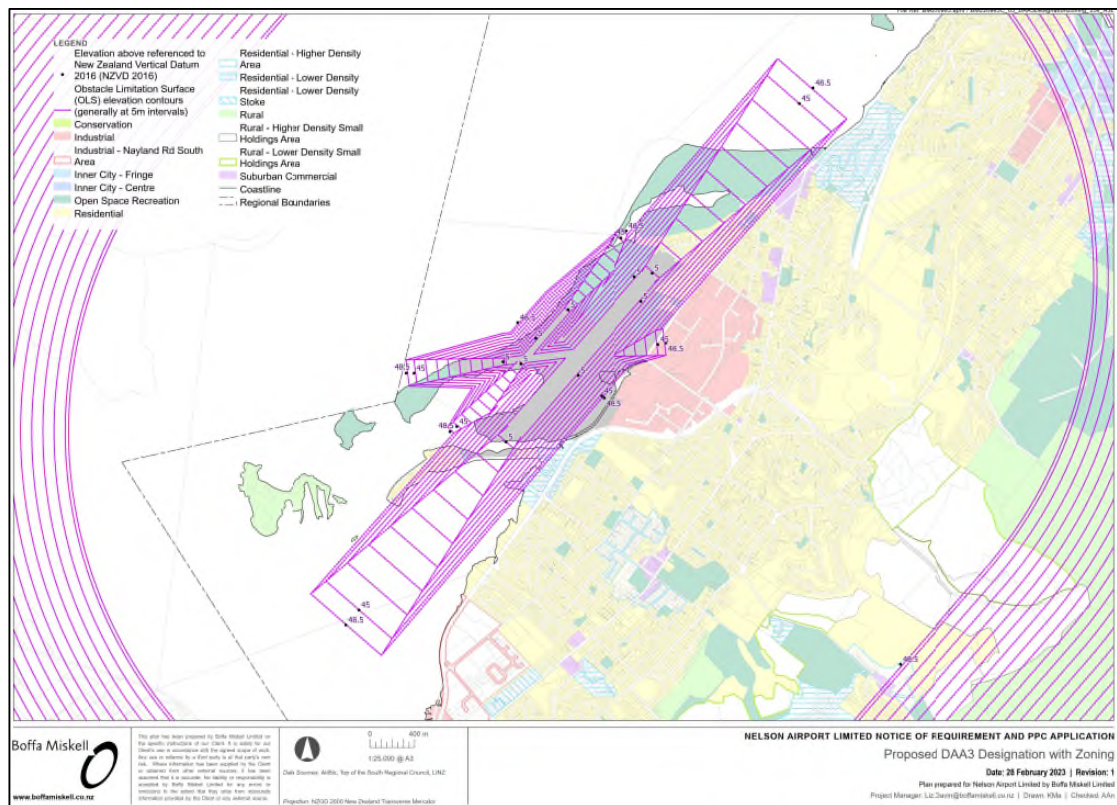


Figure 11: DAA3 Zoning

5.7 Plan Change – Site description and ownership

NAL seeks an Airport Zone, as provided for as a Special Purpose Zone within the National Planning Standards (2019). The Airport Zone replaces the Industrial Zone, Open Space and Recreation Zone, and Residential Zone. The Airport Zone is to be applied to that land within NAL's control, and as subject to the Requirement for Designation DAA1.

The legal descriptions and landowners of the land to be rezoned to Airport Zone are set out in Table 1 and are illustrated in Figure 1.

The Site description of that area to be rezoned as Airport Zone is as outlined in Section 5.4.2.

6 Description of the Notice of Requirement

Section 181 of the RMA provides for the alteration of a designation. In this case, the alteration is being sought under section 181(2) of the RMA and as such, at sections 168 to 179 and 198AA to 198AB of the RMA shall, with all necessary modifications, apply to a requirement referred to in subsection (1) as if it were a requirement for a new designation.

The following sections of this report sets out the requirements of an application under section 181(2) of the RMA.

6.1 Requiring Authority Status - Nelson Airport Limited

A NoR for a designation (or alteration to an existing designation) may only be given by a requiring authority. Section 166 of the RMA defines a requiring authority as:

- (a) a Minister of the Crown; or*
- (b) a local authority; or*
- (c) a network utility operator approved as a requiring authority under section 167.*

NAL is a network utility operator approved as a requiring authority under section 167(3) of the RMA with the following scope for the extent of its requiring authority powers gazetted (included as **Attachment D**):⁸

- (a) For its operation, maintenance, expansion and development of the airport known as Nelson Airport; and*
- (b) For the project comprising the existing and future development of Nelson Airport as described in the designation in the Nelson City Council district plan operative at the date of the commencement of this notice.*

6.2 NAL's Existing Designations in the NRMP

Designations are a common planning tool used for infrastructure, including airports,, and the NRMP identifies many sites in Nelson as being subject to a designation. In a legal sense, a designation serves two separate but related purposes:

- *It protects the opportunity* to use the designated land for a public work, project or work, in that no one can undertake an activity that would prevent or hinder the designated work, without the prior written approval of the requiring authority (in this case NAL) that would hold the designation.
- *It provides district (land use) planning authorisation* (that is the NRMP identifies those 'regional provisions' that remain applicable), and removes the need for land use (section 9 RMA) consents for activities and developments anticipated or provided by the designation.

Against that context, NAL holds the following existing designations in the NRMP related to the operation of the Nelson Airport:

⁸ Resource Management (Approval of Nelson Airport Limited as Requiring Authority Notice) 1999 at [3].

- DAA1 – this designation covers the main airport area and enables core airport operations. The designation protects the operational capability of the existing airport and provides for associated development of aviation (and ancillary) activities.
- DAA2 – this designation provides for the ANB controls which impose limits on the level of aircraft noise that the airport can generate and imposes controls on the development of other noise sensitive activities within the ANB. There are a range of conditions on the designation relating to management of noise from aircraft operations and compliance and monitoring measures.
- DAA3 – this designation imposes height restrictions on development, structures, buildings and objects (including trees and antenna) in order to protect aircraft manoeuvring in and out of the airport, in accordance with Civil Aviation requirements.

As NAL already has existing designations and operational runways, the focus of the assessment of effects on the environment for the NoR is on the change in effects as a result of the proposed alterations to the designations.

6.3 The proposed alterations to NAL's existing designations

NAL is seeking to expand its existing Designation DAA1 in the NRMP to designate land for the construction, operation, use and maintenance of land to the north of its current landholdings - over an area of land that is currently owned, occupied and utilised by the Nelson Golf Club and land that it owns to the east of Jenkins Creek and at Awatea Place. The land subject to the amended Designation is shown on the location Plan in **Figure 6**. This is primarily required to enable an extension to the existing main runway to the north, but also includes land to the east of the Airport adjoining Jenkins Creek as owned and operated by NAL and therefore able to be integrated within the Designation purpose.

As a result of the changes to the spatial extent of DAA1, consequential changes are required to Designation DAA2 (ANB Controls) and Designation DAA3 (Airport Height Restrictions) in the NRMP.

6.4 The Objectives for the NoR

The primary drivers of the NoR are to enable an extension to the existing runway in order to ensure it can continue to provide for current and future sustainable aircraft types and improve operational resilience and safety. The impending arrival and developments of sustainable, green energy aircraft are detailed further below at Section 13.3.

As outlined further below at Section 13.3.1, when considering this NoR, one of the matters the consent authority is required to consider is the effects of allowing the NoR, having particular regard to whether it is reasonably necessary for achieving the objectives of the requiring authority⁹.

The objectives of NAL as the requiring authority for this NoR are:

~ *Extend the operational runway length in order to ensure that over the next 30 years the aeronautical capacity of the airport and runway system can safely and efficiently:*

⁹ RMA s171(1)(c).

- *provide increased operational resilience and reliability; and*
- *enable forecast demand and accommodate future aircraft types.*
- ~ *Enable an efficient, flexible and sustainable approach to developing Airport infrastructure, facilities and services.*
- ~ *Minimise the effects of aircraft noise impacts on the surrounding community as far as practicable whilst also minimising adverse environmental and cultural effects.*

6.5 Project Outcomes

In accordance with NAL's objectives described above, the NoR will enable NAL to achieve those objectives by:

- Ensuring that NAL can safely and efficiently accommodate future sustainable aircraft types.
- Protecting the proposed northern runway extension from development that may prevent or hinder the project as adjoining the existing infrastructure and designation associated with Nelson Airport.
- Efficiently and effectively responding to and providing for the resolution of constraints and impediments associated with the current runway configuration and length, including payload restrictions under certain weather conditions.
- Improving safety of operations through the provision of RESA at each end of the runway. A RESA is a graded area provided at the ends of a runway to reduce the risk of damage to aircraft in the event of an undershoot, overshoot, or excursion from the runway.
- Providing certainty in respect of the location of the medium-term Airport configuration and operations, including: associated noise exposure effects and compliance and management requirements of NAL, and the OLS.
- Enabling high quality and resilient strategic infrastructure.

6.6 Proposed form of altered DAA1

Designation DAA1 will provide for 'Airport and Aerodrome Purposes' and will include a comprehensive suite of Proposed Conditions that effectively manage the actual or potential effects of the northern runway extension on the surrounding environment. The activities enabled by the altered designation (subject where appropriate to conditions), include:

- Aviation Activity: Means any activity associated with the operation of the Airport, including (but not limited to):
 - runways, taxiways, and other aircraft movement areas and aprons, terminals, rescue facilities, navigation and safety aids and facilities, bird management devices and activities, maintenance and servicing facilities, catering facilities, air freight facilities, quarantine and incinerating facilities, border control facilities, fuelling facilities, stormwater facilities, roads, landscaping and aviation signage; and

- any activity associated with commercial, recreational, or military aviation, including any ancillary maintenance and support facilities, navigation, meteorological and aircraft operational facilities.
- Airport Related Activity:
 - Means an ancillary activity or service that provides support to the Nelson Airport or an Aviation Activity. This includes, but is not limited to:
 1. land transport activities;
 2. a building or structure;
 3. servicing and infrastructure;
 4. police stations, fire stations, health facilities and education facilities;
 5. retail and commercial activities and industry associated with the needs of Airport passengers, visitors and employees and / or aircraft movements and Airport businesses;
 6. ancillary office facilities; and
 7. renewable energy generation for the purpose of using energy within the Airport and Aerodrome Purposes Designation, and can extend to supplying an immediate community, or connecting into the distribution network.
- Associated Office Facilities;
- Roads, Accessways, Stormwater related-facilities, monitoring activities, Site investigation activities, Network utility activities, and Landscaping;
- Vehicle parking and storage, rental car facilities, vehicle valet activities, and public transport facilities;
- Signage, artworks or sculptures, Aviation Activity related billboards and directional signage, and flags;
- Structures to mitigate against the impact of Natural hazards;
- All Building work, Construction and Earthwork activities, including associated Structures;
- Ancillary activities, Buildings and Structures related to the above; and
- Servicing, testing and Maintenance activities related to the above.

The Proposed Conditions to be attached to the altered Designation DAA1 are included in **Attachment B1**.

The activities provided for under the designation should also be considered in conjunction with the range of activities provided for within the associated proposed Airport Zone and Precincts (described at Section 14 of this report).

6.6.1 DAA1 Designation Spatial Extent

Principally, the altered Designation (DAA1) provides for the following:

To the North, it includes all or part of Lot 2 DP493143, Lot 2 DP 17638, Pt Section 111 Suburban South District, Lot 2 DP 472 101 (owned by Nelson Golf Club Incorporated) and Lot 2 DP 409237 (owned by NAL) to provide for and enable (as shown on Figure 12):

- the extension of existing runway 02/20 northwards by 370m, on land owned by NAL and land in the ownership of a third party (and currently used as a golf course);
- provision of a RESA of 240m long x 150m wide at the northern end of the runway, starting at the end of the runway strip which is 60m further north than the end of the extended runway;
- shortening of the southern end of the existing runway by 207m to provide space to accommodate a 240m x 150m RESA at the southern end; and
- the overall result of the northerly lengthening and southerly shortening is that the runway is extended north of its current location to achieve a 1,510m x 45m runway length and width (the existing is 1,347m x 45m). As a result of Civil Aviation Rule 139.51 (b)(4), the increase in the length of the main runway (which exceeds 15m) triggers a requirement for RESA.¹⁰ The RESA at each end of the runway must conform with the guidance provided within CAA Part 139 Appendix A.1 'Physical Characteristics for RESA'. The RESA must be constructed to provide 'a cleared and graded area to reduce the risk of damage to an aeroplane'.¹¹ The RESA to the north will be grassed. The RESA to the south-west will likely remain a mix of paved area and grass.

To the East, it includes all of Section 1 SO 301599 and PT Section 86 Suburban South District (as owned by NAL).

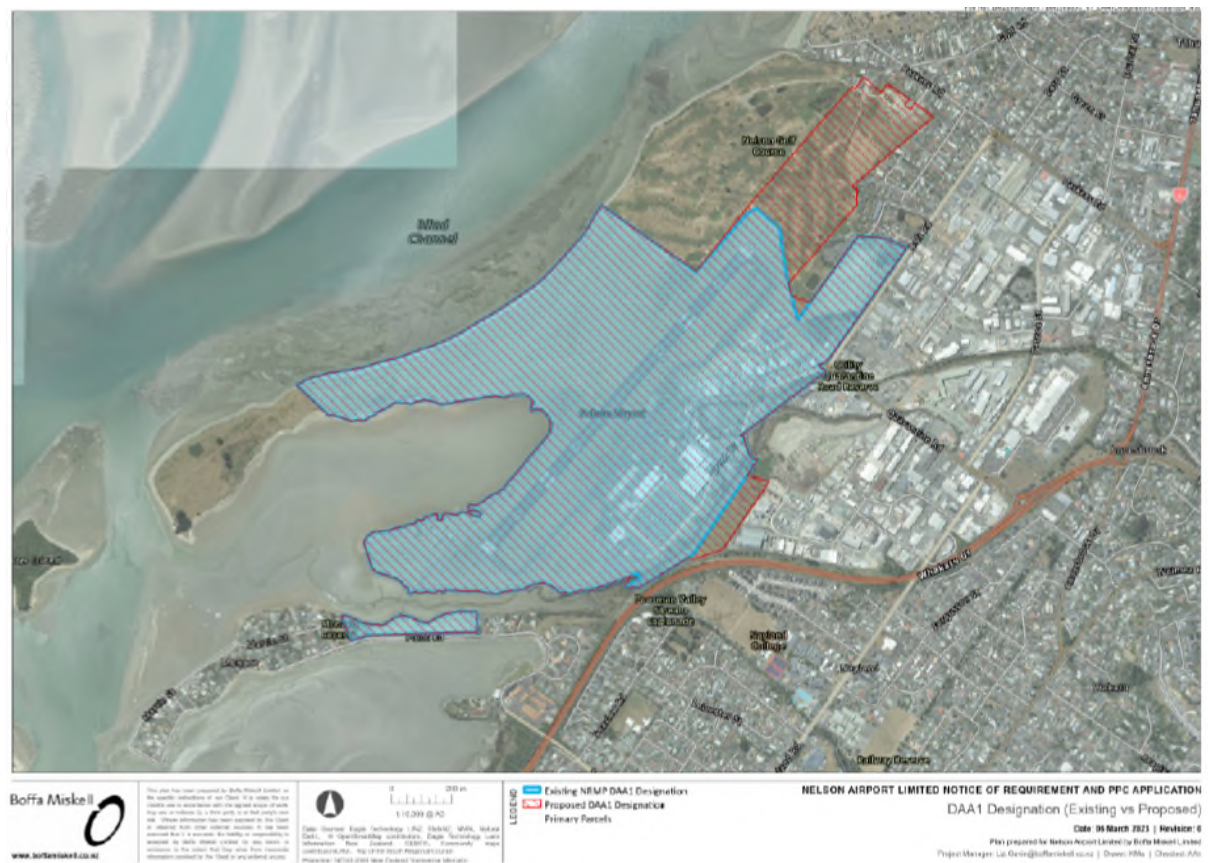
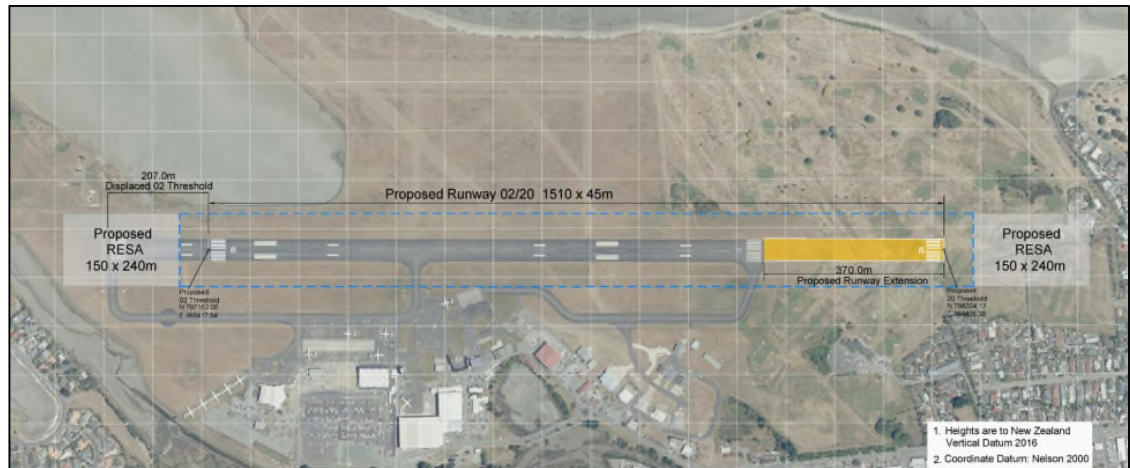
The spatial extent of DAA1 (existing and as proposed to be altered through the NoR) is set out in Figure 13 which illustrates the amendments in spatial extent between the operative Designation and that sought through this process.

The consequences of the runway extension, and associated airport operations includes:

- Changes to geomorphology associated with construction, being:
 - o Establishment of pavement surfacing for the runway.
 - o Forming and establishing RESA.
 - o In conjunction with obtaining necessary regional consents as associated with amendments to the channelised Maire Stream tributary (which transects the proposed northern RESA) and stormwater management and earthworks associated with the above.
- Changes to land uses, including:
 - o Changes to that portion of Nelson Golf Course within DAA1.
 - o Reconfiguration of the Airport Walkway (Airport Perimeter Walk) which links to the Airport Peninsula Walk south-west of the Airport (noting that the Airport Walkway is under the control and management of the NAL, with no obligation as to maintaining access).

¹⁰ Civil Aviation Rules Part 139, 193.51(b)(4).

¹¹ Civil Aviation Rules Part 139, Appendix A.1(d).



6.6.2 DAA2 and DAA3 Designation Spatial Extent

As a result of the changes to the spatial extent of DAA1, consequential changes are required to DAA2 (ANB controls) and DAA3 (OLS) as follows:

- Realigning the ANB (Figure 14) as associated with the noise contours in DAA2 to reflect the modelled forecast aircraft activity associated with the extended runway and planning management regime as set out in NZ Standard (NZS) 6805:1992 Airport Noise Management and Land Use Planning (**NZS6805:1992**).
- Amending the OLS (Figure 15 and Figure 16) within Designation DAA3 to provide for existing operative runways and the extended main runway. The obstacle clearance height restriction specifications for the Airport's runways (as associated with DAA1) are set out in DAA3, and include:

Approach Surfaces – an Approach Surface is located at both ends of all runways in accordance with civil aviation requirements for both approach and take-off. The geometry of each Approach Surface is:

- i. for Main Runway 02-20, starting at 150m in width at the end of the runway strip, with slope rising at a gradient of 1:50 (2.0%) from the end of the runway strip until reaching an elevation of 153.5m, and diverging wider each side at 1:6.6 (15%).
- ii. for Grass Runways 02-20 and 06-24, starting at 60m in width at the end of the runway strip, with slope rising at a gradient of 1:20 (5%) from the end of the runway strip until reaching an elevation of 48.5m, and diverging wider each side at 1:10 (10%).

Inner Horizontal Surfaces – the Inner Horizontal Surface is a flat planar surface at an altitude of 48.5m. The geometry of each Inner Horizontal Surface is:

- i. Main Runway 02-20: Outer limits located 4,000m from and parallel to the outer sides and ends of the runway strip. The corners of the resulting rectangle are formed by a radius of 4,000m.
- ii. Grass Runways 02-20 and 06-24: Outer limits located 2,000m from and parallel to the outer sides and ends of the runway strip. The corners of the resulting rectangle are formed by a radius of 2,000m.

Transitional Surfaces – the Transitional Side Surfaces slope upwards and outwards from the sides of the three runway strips at gradients of 1:7 for the Main Runway 02-20, and 1:5 for the two grass runways, until they meet the Inner Horizontal Surface and the Approach Surfaces.

Conical Surface – the Conical Surface slopes upwards and outwards from the periphery of the Inner Horizontal Surface at a gradient of 1:20 until it reaches an elevation of 153.5m.

Controlling Surface – at any points where any two surfaces overlap and are at differing elevations, the lower of the two surfaces shall apply for the composition of the surfaces into the Nelson Airport OLS.

As noted above, both the boundaries for Designation DAA2 (as associated with the ANB) and Designation DAA3 (as associated with the OLS) relate to a composite of existing and extended runway configurations.



Figure 14: Proposed Airnoise Boundary and basis for DAA2 Source: Marshall Day Acoustics

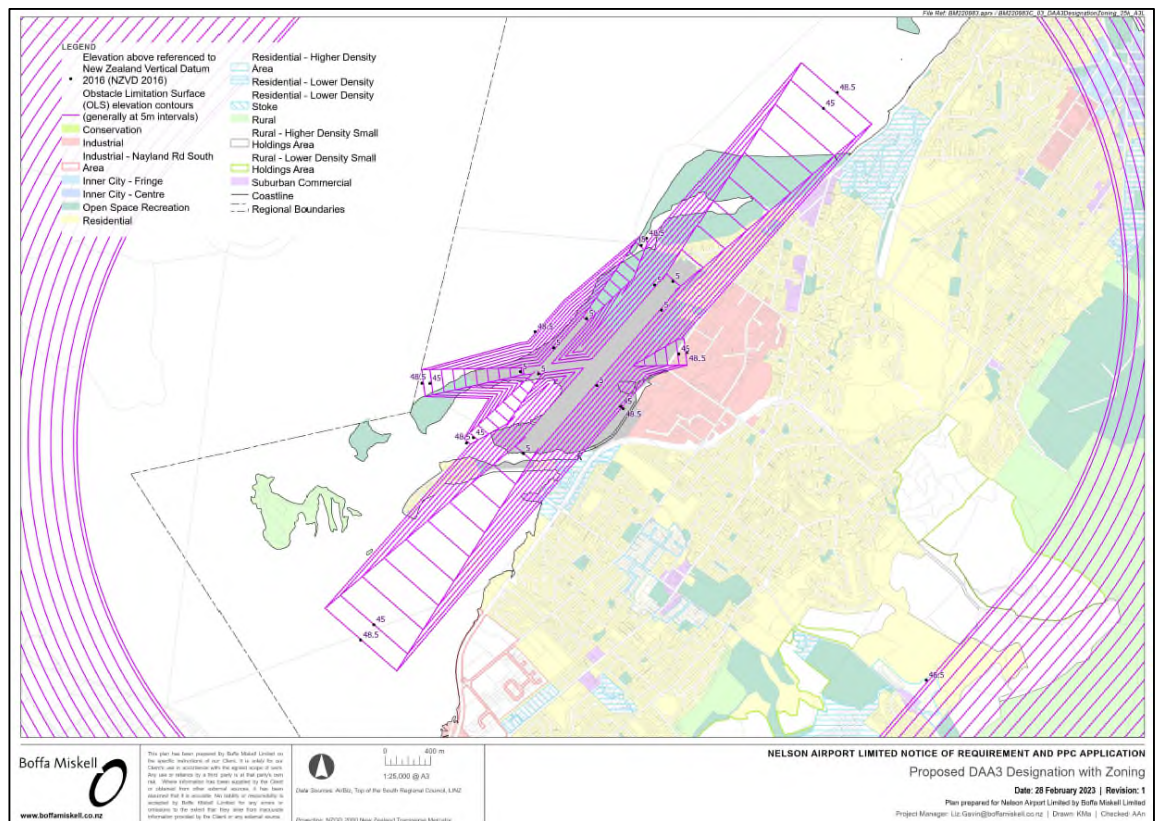


Figure 15: Obstacle Limitation Surface. OLS layer prepared by Airbiz and overlaid on Zoning map by Boffa Miskell

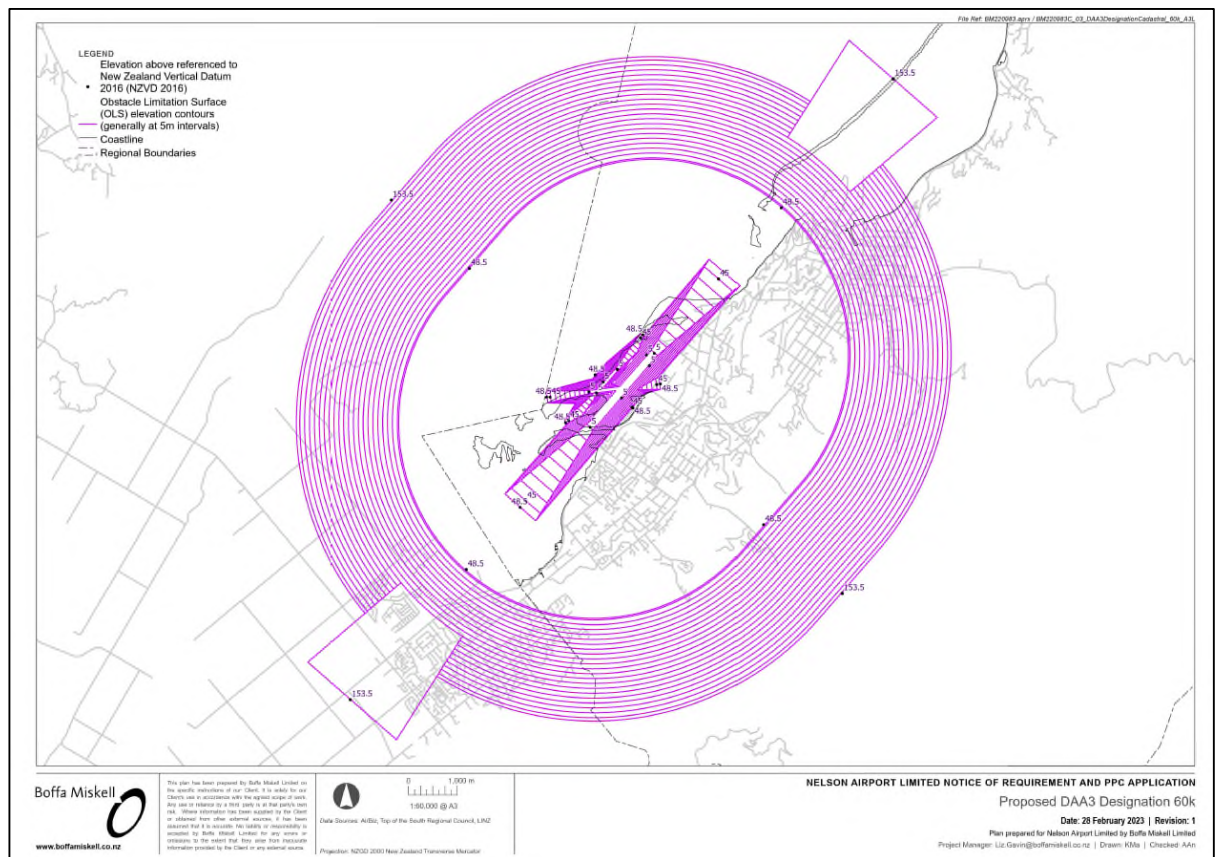


Figure 16: Obstacle Limitation Surface. OLS layer prepared by Airbiz and overlaid on Zoning map by Boffa Miskell

6.7 Aspects and Approvals Not Covered

Future consents, authorisations and approvals that are not sought concurrently with this Application, and are therefore not addressed in this documentation, may include:

- Authorisations given under other statutes such as Archaeological Authorities under the HNZPTA, or any works that affect the surrounding road network and require approval from NCC as Road Controlling Authority under the Local Government Act 2002.
- Authorisation given by the Director-General of the Department of Conservation under section 53 of the Wildlife Act 1953 in relation to any protected wildlife.
- Regional resource consents that may be required by the relevant provisions of the NRMP or applicable National Environmental Standards (such as NES-F).
- The submission of outline plans under section 176A of the RMA (NAL is not seeking to waive the requirement to submit outline plans).
- Consents that are pursued through the underlying Airport Zone (as sought through the accompanying PPC) for activities that are not expressly provided for by Designation DAA1.

7 Description of the Plan Change

This Section sets out the components of the PPC requested by NAL to the NRMP.

7.1 NRMP amendments

The PPC seeks to create an Airport Zone and change the underlying zoning of the land subject to Designation DAA1 in the NRMP from its current Industrial, Residential and Open Space and Recreation zoning.

The main purpose of the PPC is to ensure that there is clarity between Designation DAA1 (as included in this NoR) as to which 'Airport Purpose' activities would be able to be pursued through the Outline Plan process set out in Section 176A of the RMA, and those activities which benefit from an Airport location but which should be subject to an underlying district plan framework. Such an approach improves certainty for NAL and for users of the NRMP and signals to the broader community the anticipated range of Airport uses.

Within the proposed Airport Zone, Precincts (as identified through the Airport Master Plan) are proposed to guide development at the Airport and to link to activities provided for under Designation DAA1 (such as permitted Aviation Activities in the Core Airport Precinct).

The Precincts as below (**Figure 17**), are predicated on the long-term sustainable development of the Airport and associated land and physical resources. Accordingly, the revised precincts and associated provisions are more efficient and effective in recognising and providing for Airport operations as nationally and regionally significant infrastructure. The focus is on the range of activities anticipated to be undertaken or provided within these areas, rather than their spatial confines which are represented in the Planning Maps.

Proposed Precincts

Core Airport Precinct – which provides for aviation operations and expansion, with balance land managed for associated activities necessary to protect the safety of Aircraft Operations, and compatible and beneficial uses of the land, including the promotion of green energy.

Airport Environs Precinct – which provides a mix of business activity, including industry, Airport Related Activities, and tourist and visitor / workforce support activities.

Airport Coastal Precinct – which provides for uses adjoining the CMA and Jenkins Creek associated with ongoing Airport Operations, such as internal roading, revetment, lighting and navigational aids; while recognising the values of the coastal environment.

The operative zoning regime NRMP (which is Industrial, Residential and Open Space and Recreation zoning) has been operative since 2004 and does not reflect:

- the actual land use as evident in the extent of Airport and ancillary facilities;
- the activities of a contemporary airport nor the role and function of Nelson Airport as nationally and regionally significant infrastructure; and
- the more appropriate 'Airport Zone' as provided in the National Planning Standards (2019) to be applied to Airport facilities and associated land areas.

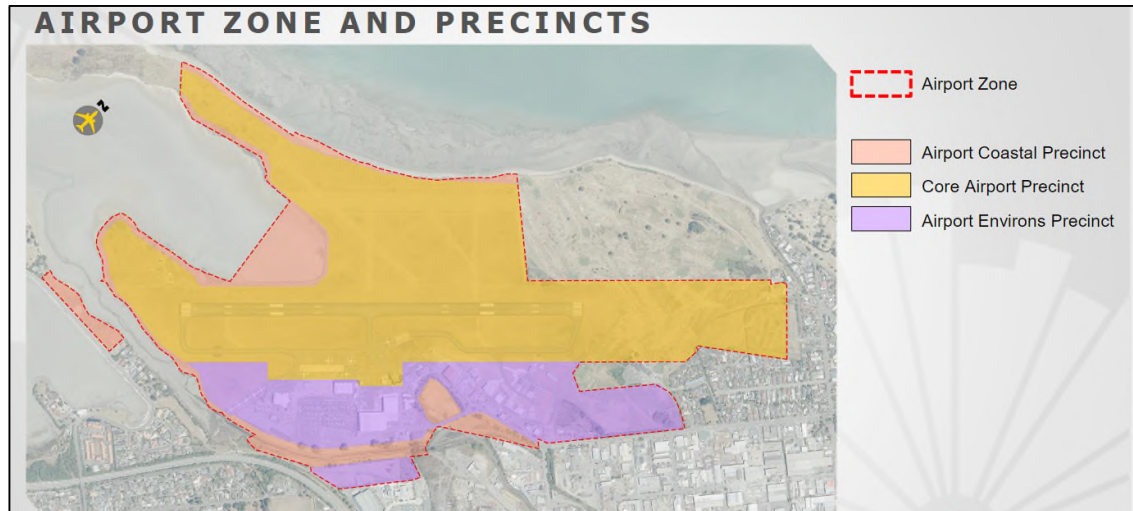


Figure 17: Airport Zone Precinct Plan. Source: Airbiz

Accordingly, an Airport Zone and numerous changes are proposed to the NRMP. These changes include:

- The formation of Chapter 15 Airport Zone, and associated provisions as associated with that land contained within DAA1 as proposed in the NoR.
- Amendments to Chapter 5 District Wide provisions to strengthen the role and function of Nelson Airport as nationally and regionally significant infrastructure and incorporate policy related to managing reverse sensitivity effects on Nelson Airport.
- Amendments to Chapter 11 Industrial provisions to remove provisions that relate to Nelson Airport.
- Amendments to Chapter 7 Residential, Chapter 10 Industrial, Chapter 11 Open Space and Recreation, Chapter 4 Suburban Commercial and Chapter 14 Conservation Zones to provide a consistent rule suite avoiding the establishment of ASAN from establishing within the AECO and ANB.
- Inserted and amended definitions to Chapter 2 Interpretation to provide for the above.

8 Statutory Framework

8.1 Overview

The following section sets out a summary of the statutory framework required for the consideration of the PPC and NoR.

8.2 Framework for the Notice of Requirement

Section 181(1) of the RMA provides that a requiring authority may at any time give notice of its requirement to alter its designation. An alteration to a designation is processed as if it were a new notice of requirement, unless the alteration involves no more than a minor change to the effects on the environment associated with the use or proposed use of the land or involves only minor changes to the boundaries of a designation.

As the proposed alterations to Designations DAA1, DAA2, and DAA3 will involve a more than minor change to the effects on the environment, the alteration to the designation must be considered as if it were a new notice of requirement (with sections 168 to 179 and 198AA to 198AD of the RMA applying with all necessary modifications, as if it were a requirement for a new designation).

Section 169(1) establishes that a territorial authority's decision to notify a notice of requirement is under section 149ZCB(1) to (4), 149ZCC(1) to (4), 149ZCE, and 149ZCF which apply with all necessary modifications. NAL formally requests public notification of the NoR.

Section 171 sets out the matters that must be considered by a territorial authority in making a recommendation to the requiring authority on a notice of requirement, as follows:

Section 171 Recommendation by territorial authority

- (1A) When considering a requirement and any submissions received, a territorial authority must not have regard to trade competition or the effects of trade competition.*
- (1) When considering a requirement and any submissions received, a territorial authority must, subject to Part 2, consider the effects on the environment of allowing the requirement, having particular regard to—*
 - (a) any relevant provisions of—*
 - (i) a national policy statement;*
 - (ii) a New Zealand coastal policy statement;*
 - (iii) a regional policy statement or proposed regional policy statement;*
 - (iv) a plan or proposed plan; and*
 - (b) whether adequate consideration has been given to alternative sites, routes, or methods of undertaking the work if—*
 - (i) the requiring authority does not have an interest in the land sufficient for undertaking the work; or*
 - (ii) it is likely that the work will have a significant adverse effect on the environment;*
 - and*
 - (c) whether the work and designation are reasonably necessary for achieving the objectives of the requiring authority for which the designation is sought; and*

- (d) any other matter the territorial authority considers reasonably necessary in order to make a recommendation on the requirement.*
- (1B) The effects to be considered under subsection (1) may include any positive effects on the environment to offset or compensate for any adverse effects on the environment that will or may result from the activity enabled by the designation, as long as those effects result from measures proposed or agreed to by the requiring authority.*
- (2) The territorial authority may recommend to the requiring authority that it—*
- (a) confirm the requirement:*
 - (b) modify the requirement:*
 - (c) impose conditions:*
 - (d) withdraw the requirement.*
- (2A) However, if the requiring authority is the Minister of Education or the Minister of Defence, the territorial authority may not recommend imposing a condition requiring a financial contribution (as defined in section 108(9)).*
- (3) The territorial authority must give reasons for its recommendation under subsection (2).*

In this case, the following sections are considered relevant to the assessment and are contained in this report:

- Section 171(1)(a) – relevant provisions of a national policy statement, coastal policy statement, regional policy statement, plan or proposed plan.
- Section 171(1)(b) – whether adequate consideration has been given to alternative sites, routes or methods of undertaking the work if the requiring authority (NAL) does not have an interest in the land required for the work.
- Section 171(1)(c) – whether the work and designation are reasonably necessary in order to make a recommendation.
- Section 171(1)(d) – any other matter NCC considers reasonably necessary in order to make a recommendation.
- Part 2 of the RMA.

The focus of the assessment is on the change or alteration.

8.2.1 Part 2

Section 171(1) RMA provides that when considering a requirement and any submissions received, a territorial authority must, subject to Part 2, consider the effects on the environment of allowing the requirement, having particular regard to the matters outlined in s171(1)(a) to (d). In the context of assessing notices of requirements, the matters addressed in Part 2 must be considered as well as those set out in section 171(1)(a) to (d).

8.2.2 Outline Plan

Section 176A of the RMA provides that an outline plan must be submitted to a territorial authority before commencing construction of a project or work under a designation unless certain circumstances apply. These circumstances are set out in section 176A(2) of the RMA.

The circumstances in clauses section 176A(2)(a) and (b) do not apply to this NoR and, in respect of section 176A(2)(c), NAL does not seek that the requirement for an outline plan be waived. It is anticipated that outline plans, detailing all relevant aspects of the runway extension project (required by section 176A(3) of the RMA) will be submitted following the completion of the detailed design of the runway extension project and prior to the commencement of construction works.

Section 176A(3) sets out the content of an outline plan as follows:

- 3) *An outline plan must show—*
- (a) the height, shape, and bulk of the public work, project, or work; and*
 - (b) the location on the site of the public work, project, or work; and*
 - (c) the likely finished contour of the site; and*
 - (d) the vehicular access, circulation, and the provision for parking; and*
 - (e) the landscaping proposed; and*
 - (f) any other matters to avoid, remedy, or mitigate any adverse effects on the environment.*

8.2.3 Review of the Designation

Designations DAA2 and DAA3 are a composite of the ANB and OLS respectively as associated with the existing runway configurations and an extended main runway. Nelson Airport will, at the time the extended runway becomes operative, give notice to remove those aspects of the OLS and ANB that become redundant by virtue of the amended main runway configuration, as pursuant to section 182 of the RMA.

8.3 Plan Change – Statutory framework

8.3.1 Acceptance of the PPC

Under clause 25(4) of Schedule 1 to the RMA, NCC may choose to reject the PPC in whole or in part on certain grounds. For the reasons outlined in the Table below, the PPC can be accepted by NCC under clause 25. The table below provides an assessment of the PPC against clause 25.

AVAILABLE RESPONSES FOR NCC	COMMENT
<i>(2)(a) adopt the request, or part of the request, as if it were a proposed policy statement or plan made by the local authority itself</i>	This would mean the PPC request would be treated as a Proposed Plan Change from NCC. NAL is not seeking that the PPC requested be adopted by NCC.
<i>(2)(b) accept the request, in whole or in part, and proceed to notify the request</i>	<p>The PPC meets the criteria to be accepted by NCC for processing, as demonstrated by the assessment against subclauses (3) and (4) below.</p> <p>If NCC accepts the request, the procedure set out in Schedule 1, clause 26 applies.</p>

AVAILABLE RESPONSES FOR NCC	COMMENT
<p><i>(3) the local authority may decide to deal with the request as if it were an application for a resource consent</i></p>	<p>The purpose of the PPC would not be achieved by a resource consent process in that the Airport Zone would not be able to be created nor would appropriate provisions be included in NRMP provide appropriate recognition of the Airport as nationally and regionally significant infrastructure and a consistent approach to managing ASAN. The proposed PPC does not remove the requirement to obtain resource consent for particular activities once the PPC is adopted. Accordingly, it is not appropriate for the PPC to be treated as though it were an application for resource consent.</p>
<p><i>(4) The local authority may reject the request in whole or in part, but only on the grounds that:</i></p> <p><i>(a) the request or part of the request is frivolous or vexatious; or</i></p> <p><i>(b) within the last 2 years, the substance of the request or part of the request –</i></p> <p><i>(i) has been considered and given effect to, or rejected by, the local authority or the Environment Court; or</i></p> <p><i>(ii) has been given effect to by regulations made under section 360A; or</i></p> <p><i>(c) the request or part of the request is not in accordance with sound resource management practice; or</i></p> <p><i>(d) the request or part of the request would make the policy statement or plan inconsistent with Part 5; or</i></p> <p><i>(e) in the case of a proposed change to a policy statement or plan, the policy statement or</i></p>	<p>The PPC requested is not frivolous or vexatious, and within the last 2 years, the substance of the request or part of the request has not been considered by either the NCC or the Environment Court, or been given effect to by regulations made under section 360A.</p> <p>The PPC requested is not contrary to sound resource management practice and has been carefully considered within the context of the objectives and policies of the NRMP. In particular, the timing of the PPC requested is consistent with sound resource management practice. By seeking both a PPC and a NoR in parallel, there is transparency around Nelson Airport's long term proposed use of the site. Further, a joint process will be more efficient for all parties.</p> <p>As discussed in Section 15, the PPC requested is consistent with the purpose and principles of Part 5 of the RMA. The NRMP has been operative for more than 2 years. There is not considered to be any basis for NCC to reject the PPC request in whole or in part.</p>

AVAILABLE RESPONSES FOR NCC	COMMENT
<i>plan has been operative for less than 2 years.</i>	

8.3.2 Statutory considerations

Part 2 of Schedule 1 sets out the requirements for requests for private plan change requests.

Clause 21(1) of Schedule 1 of the RMA states that “Any person may request a change to a district plan or a regional plan (including a regional coastal plan).” Clause 22 outlines the required form of the request and provides that where any environmental effects are anticipated, then these are only relevant to the extent that they result from the implementation of the plan change. That is, the assessment of effects should be limited to any assessment of any effects arising from the amendments to the planning provisions proposed by this PPC request.

Clause 21(1) also requires a private plan change request contain an evaluation report prepared in accordance with section 32 (which is set out in Section 14 below).

The statutory requirements for consideration of private plan changes are:

- (a) Provisions in the Plan are to assist NCC in undertaking its functions under the Act¹², including the function of seeking to achieve the integrated management of the use, development and protection of land and associated natural and physical resources of the (Nelson) District¹³.
- (b) Important physical resources include both Nelson Airport and existing adjacent residential areas within the form and development of Nelson’s urban area. Natural resources include the interface of Nelson Airport with the CMA and Maire Steam, and the ecological and landscape values supported by these natural resources.
- (c) That function is to be fulfilled by objectives, policies and methods within the District Plan, controlling any actual or potential effects of the use, development and protection of land¹⁴, the CMA¹⁵, water¹⁶ and contaminants¹⁷, including for the control of emission of noise and the mitigation of the effects of noise¹⁸.
- (d) The approach needs to align with NCC’s functions under the Act and other relevant instruments.

¹² Sections 30(1)(a) and 74(1)(a).

¹³ Sections 30(1)(a) and 31(1)(a).

¹⁴ Section 31(1)(b).

¹⁵ Section 30(1)(d).

¹⁶ Section 30(1)(e).

¹⁷ Section 30(1)(f).

¹⁸ Section 31(1)(d).

- i. That processes (and provisions that drive processes) are timely, efficient and cost effective and proportionate to the functions being performed, and that plan drafting is clear and concise (section 18A); and
- ii. When reaching a conclusion as to which provision is the ‘*most appropriate*’ the requirements of section 32, having regard to the efficiency and effectiveness of the provision is to be considered.

The PPC seeks to amend relevant District Plan provisions within the NRMP. The focus in the assessment there is largely therefore in terms of the **purpose** of the District Plan set out in section 72 of the RMA which states:

“the purpose of the preparation, implementation and administration of district plans is to assist territorial authorities to achieve the purpose of this Act.”

The relevant questions in terms of NCC's functions in relation to the development, form, infrastructure integration, and amenity associated with the PPC and associated provision of the Airport Zone are therefore:

- (a) are controls necessary and appropriate to achieve integrated management of the use, development and protection of land and associated natural and physical resources; and
- (b) are resultant provisions (objectives, policies and rules (including zones)) appropriate to manage any actual or potential effects of the use, development of protection of land.

8.3.3 Part 2

There are limited circumstances in which it is permissible to have regard to Part 2 when making decisions about the form and content of regional and district plans. These are where there is an allegation the relevant plan or its provisions are invalid under the RMA, the relevant plan has incomplete coverage, in that it does not capture the activity or issue in question or it is uncertain or unclear which provisions apply, or how the provisions of the relevant plan are intended to apply to the particular activity or issue.

The NRMP is a reasonably old planning document, so it is considered (for completeness) appropriate in the circumstances to undertake a fulsome analysis of the PPC against Part 2. Further, as part of the section 32 analysis, consideration has been given to the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of the RMA.

9 Assessment of alternatives for the Notice of Requirement

9.1 Overview

As part of the NoR process, the Project Team has undertaken a Multi Criteria Analysis (**MCA**) to guide decision making in terms of the requirements set out in section 171(1)(b) of the Act as set out above and to test the runway options from a resource management perspective.

The basis by which the MCA has been provided is predicated on s171(1)(b)(i) in that NAL does not have an interest in all of the land sufficient for undertaking the work.

Two options that were considered and assessed to achieve a 1,510m runway (existing is 1,347m) length with 2 x 240m RESA at each end are:

- Option A (northern); and
- Option B (southern).

As either option would require a runway extension onto land that NAL does not have a (financial) interest in, there is a statutory requirement to consider 'alternative sites' for undertaking the work.

Preliminary discussions between NAL and its advisers also briefly considered options such as building a new runway at a new airport site, or building a new runway within the current site or within the Waimea. These options were discarded on the basis of being grossly costly and inefficient (essentially fanciful). Accordingly, only the northern and southern options which build on the existing runway configuration and efficiently integrate with existing airport logistics, such as the terminal and facilities, have been considered by the specialist experts and considered in the MCA.

9.1.1 Option A – Current Runway Extended North

Option A involves an extension of the existing main runway 02/20 northwards by 370m, on land owned by NAL and land currently owned and occupied by the Nelson Golf Club. The configuration also involves a shortening by 207m to the runway threshold in the south to accommodate the southern RESA. This option also involves provision of the northern RESA.

Table 2: Option A – Northern Extension



The 'environment' associated with the **northern extension** is as follows:

Attribute	Values
Zoning and NRMP Notations	<p><i>Zoning and Designations</i></p> <ul style="list-style-type: none"> North - Runway extension would overlay Golf Club Land as zoned Open Space and Recreation. This area is not currently designated for airport purposes. The Golf Club is Scheduled 'SF9 – Tāhunanui Golf Clubs' Part Section 85 Suburban South-0, Lot 2 DP 17638, Lot 1 DP 4838, Part Section 111 Suburban South SO 9526 which provides for a number of permitted facilities (under Rule Oss2.i). Small parcel of landed (owned by NAL Lot 2 DP 409237) is zoned Residential. South – Provision of southern RESA would overlay NAL Land as zoned Industrial / Open Space and Recreation but designated for 'Aerodrome Purposes' (DAA1). <p><i>Overlays</i></p> <ul style="list-style-type: none"> Northern runway / RESA extension and southern RESA notated as 'Coastal Environment Overlay'. Northern runway extension / RESA and southern RESA notated as 'Inundation Overlay'. Southern RESA adjoins 'Riparian Overlay Coastline' and CMA boundary at Waimea Estuary (NRMP Appendix 25-11).
Ecology ¹⁹	<ul style="list-style-type: none"> Vegetation and terrestrial habitats are highly modified and comprised of exotic plant species of generally negligible ecological value. The

¹⁹ Attachment H1. Boffa Miskell [3.2.1, 3.3.1, 3.5.1].

Attribute	Values
	<p>exception is Maire Stream tributary, which is of moderate ecological value and consisting of 0.17 ha of indigenous dominated saltmarsh vegetation.</p> <ul style="list-style-type: none"> The lower reach of Maire Stream tributary (c1000m in total, footprint of Option A is c475m) is tidal; water or habitat quality is not routinely monitored by the NCC. While channelised and relatively modified due to urban development and golf course activities, there are recent records of banded kōkopu and longfin eel. Area is of High ecological value. In terms of avifauna limited areas of foraging and roosting habitats, largely associated with <i>Not Threatened</i> and <i>Introduced</i> species.
Landscape ²⁰	<ul style="list-style-type: none"> Not identified as an Outstanding Natural Feature / Landscape or area of Outstanding Natural Character at the Regional or District scale. Part of wider 'high' overall landscape value in Nelson Landscape Study. Moderate to low level of natural character based on 'low' abiotic, 'moderate to low' biotic and 'moderate' experiential ratings. Predominantly located within the existing Airport designation area and also extends north-east into the Nelson Golf Club landholding as well as into Maire Stream tributary. Overall, the majority of the extension area is similar in landscape character to the existing Airport designation due to the open nature of the Golf Club, exotic grass coverage and relatively flat topography.
GeoHazard ²¹	<ul style="list-style-type: none"> No major hazards present (within the Civil Defence Tsunami Evacuation Zone). Requires canalization or diversion of the Maire Stream and Maire Stream tributary drainage ditch. Far northern extent of RESA would be located with HAIL sites #10894 and #10087. No known active fault although extends into the Tāhunanui Liquefaction Study area.
Archaeology ²²	<ul style="list-style-type: none"> No recorded archaeological sites within the area of the proposed runway extension. There is a handful of sites recorded in the vicinity, indicating that the wider area was used and/or occupied by Māori. Low potential for archaeological sites, due to the ground disturbance from development that has occurred in this locality during the 20th century, although the possibility that undisturbed archaeological features may remain cannot be ruled out.

²⁰ Attachment J1. Boffa Miskell [4.6.1, 4.7.1].

²¹ Attachment I1. Stantec [Section 3].

²² Attachment G1. Underground Overground [9].

Attribute	Values																								
Community	<ul style="list-style-type: none">Number of houses in each of the noise contour bands for the Operative NRMP and the northern runway extension option²³.																								
	<table><tr><td></td><td colspan="3">Number of Dwellings</td></tr><tr><td>Noise Level (dB L_{dn})</td><td>Operative NRMP</td><td>FY50 North Extension</td><td>Change</td></tr><tr><td>55–59</td><td>707</td><td>439</td><td>-268</td></tr><tr><td>60-64</td><td>300</td><td>134</td><td>-166</td></tr><tr><td>65-69</td><td>16</td><td>40</td><td>+24</td></tr><tr><td>Total</td><td>1023</td><td>613</td><td>-410</td></tr></table>		Number of Dwellings			Noise Level (dB L _{dn})	Operative NRMP	FY50 North Extension	Change	55–59	707	439	-268	60-64	300	134	-166	65-69	16	40	+24	Total	1023	613	-410
		Number of Dwellings																							
	Noise Level (dB L _{dn})	Operative NRMP	FY50 North Extension	Change																					
	55–59	707	439	-268																					
	60-64	300	134	-166																					
	65-69	16	40	+24																					
	Total	1023	613	-410																					
<ul style="list-style-type: none">Extension area is currently occupied by a number (1, 9, 10 and 18) of golf ‘holes’ as a component of the Nelson Golf Links owned and operated by the Golf Club²⁴.																									

9.1.2 Option B – Current Runway Extended South

The second option considered involves an extension of the existing main runway 02/20 by 163m southwards without changes at the northern end, other than provision of a graded area for a RESA, shown in Table 3. below. This achieves a 1,510m long runway by building at the southern end of the existing runway, and requires development works outside the current airport site and substantial reclamations of the Jenkins Creek and foreshore area to the south of the Monaco peninsula. Point Road (between Jenkins Creek and Waimea Inlet) would need to be either diverted around, or tunnelled under the end of the proposed runway infrastructure.

²³ Attachment K1. Marshall Day Acoustics [Table 6], Attachment K2. Marshall Day Acoustics [Table 5].

²⁴ Attachment J1. Boffa Miskell [4.3].

Table 3: Option B – Southern Extension



The 'environment' associated with the **southern extension** is as follows:

Attribute	Values
Zoning and NRMP Notations	<p><i>Zoning and Designations</i></p> <ul style="list-style-type: none"> North – Northern RESA would overlay Golf Club Land as zoned Open Space and Recreation. This area is not currently designated for Aerodrome and Airport purposes. South – Provision of southern RESA and Runway Extension would encroach into the CMA. The landward side would extend over that area of Point Road zoned Open Space and Recreation (and designated for 'Aerodrome Purposes' DAA1). <p><i>Overlays</i></p> <ul style="list-style-type: none"> Northern RESA extension and southern RESA / runway notated as 'Coastal Environment Overlay'. Northern RESA and southern RESA / runway notated as 'Inundation Overlay'. Southern RESA / runway would extend into 'Riparian Overlay Coastline' and CMA boundary at Waimea Estuary (NRMP Appendix 25-11).
Ecology ²⁵	<ul style="list-style-type: none"> The vegetation and terrestrial habitats are entirely grassland within the RESA on the Nelson Golf Club Land. The freshwater habitats within and adjacent to this option include Jenkins Creek, Arapiki Stream and Poorman Valley Stream. These waterways support a number of indigenous freshwater fish species including At Risk and Threatened species, as well as spawning habitat for īnanga.

²⁵ Attachment H1. Boffa Miskell [3.2.2, 3.3.2, 3.4.3, 3.5.1].

Attribute	Values
	<ul style="list-style-type: none"> • The benthic habitat north and south of the Monaco Peninsula, which would be permanently reclaimed as part of the southward airport expansion, is located within sheltered embayments and characterised by very high mud content. • While the ecological value of Waimea Inlet overall is high, the area of benthic habitat north and south of Monaco Peninsula is assessed as low. Moreover, this CMA supports an avifauna assemblage of high ecological value, including a number of At Risk and Threatened species, and provides roosting, foraging, and nesting habitat. The Waimea Inlet is recognised as site of national and international importance for some coastal wading and shorebird species.
Landscape ²⁶	<ul style="list-style-type: none"> • The coastal waters and edges of the Waimea Estuary are recognised in the NRMP by way of a Landscape Overlay, Marine ASCV overlay and Riparian and Coastal Margin Overlay with limited options to provide mitigation due to the nature of the extension. • Extends north-east into the Nelson Golf Club landholding and south-west into the CMA of Jenkins Creek/Waimea Estuary. • The Waimea Estuary is a flat, expansive tidal system that fluctuates from sandy mudflats and channels at low tide to a full water body at high tide. The extension area consists of a similar tidal system at Jenkins Creek and within the wider Waimea Estuary south of Point Road and would also span the tidal Jenkins Creek system and connects the existing Airport designation area with the Monaco Peninsula landform to the south. • The land cover varies from sandy mudflats with shallow water channels at low tide to a full water body at high tide. The land portion consists of a grassed embankment on Monaco peninsula and Point Road at a slightly lower elevation than the grassed embankment. • The residential community of Monaco is located to the west and east of the 'southern runway' extension area on a peninsula landform that extends out into the Waimea Estuary. Coastal context is strongly exhibited here due to the proximity to the estuary waters and potential of Point Road being inundated during king tides (especially at the southern extent). • The extension area is utilised by water users for recreational pursuits (within Jenkins Creek and Waimea Estuary), road users of Point Road and pedestrian/cycle users along the shared path that follows Point Road. Several reserves are within close context. • The landscape character is within the CMA (tidal waters of Jenkins Creek/Waimea Estuary) and as such varies to the existing Airport designation area.

²⁶ Attachment J1. Boffa Miskell [4.4, 7.1.2].

Attribute	Values																								
	<ul style="list-style-type: none">Wide viewing audience, ranging from private dwellings, recreational users of walking/cycling tracks, road users of Point Road and water users of Jenkins Creek/Waimea Estuary.																								
GeoHazard ²⁷	<ul style="list-style-type: none">Within the Civil Defence Tsunami Evacuation Zone.Poor ground conditions with soft estuarine soils along the southern option are likely to be susceptible to settlement requiring significant ground improvement and earthworksNo known active fault although likely extends into the Tāhunanui Liquefaction Study area.Jenkins Creek would require culverting under the runway extension or diverting to the south into Waimea inlet. Point Road (between Jenkins Creek and Waimea Inlet) would need to be either diverted around, or tunnelled under, the end of the proposed runway infrastructure.																								
Archaeology ²⁸	<ul style="list-style-type: none">No recorded archaeological sites within the area of the southern runway extension option. There is a handful of sites recorded in the vicinity, indicating that the wider area was used and/or occupied by Māori.A high likelihood that one or more archaeological sites associated with pre-European Māori occupation will occur within the area of the southern runway extension and that such remains are likely to be of moderate to high archaeological value, depending on the type of site encountered, which could include kōiwi/human remains. The extensive nature of the earthworks required for the southern runway extension will mean that all archaeological sites in this area will be obliterated, resulting in a significant adverse effect on the archaeological values of any such site.																								
Community	<ul style="list-style-type: none">Number of houses in each of the noise contour bands for the Operative NRMP and the southern runway extension option²⁹. <table><tr><th></th><th colspan="3">Number of Dwellings</th></tr><tr><th>Noise Level (dB L_{dn})</th><th>Operative NRMP</th><th>FY50 North Extension</th><th>Change</th></tr><tr><td>55–59</td><td>705</td><td>479</td><td>-226</td></tr><tr><td>60-64</td><td>300</td><td>115</td><td>-185</td></tr><tr><td>65-69</td><td>16</td><td>11</td><td>-5</td></tr><tr><td>Total</td><td>1021</td><td>605</td><td>-416</td></tr></table>		Number of Dwellings			Noise Level (dB L _{dn})	Operative NRMP	FY50 North Extension	Change	55–59	705	479	-226	60-64	300	115	-185	65-69	16	11	-5	Total	1021	605	-416
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65-69	16	11	-5																						
Total	1021	605	-416																						

²⁷ Attachment I1. Stantec [Section 3].

²⁸ Attachment G1. Underground Overground [9].

²⁹ Attachment K1. Marshall Day Acoustics [Table 6].

Attribute	Values
	<ul style="list-style-type: none"> Extension area, including provision of RESA at northern end is currently occupied by a number 9 golf 'hole' as a component of the Nelson Golf Links owned and operated by the Golf Club. The Airport Perimeter Walk would also likely be severed due to the runway extension bridging Jenkins Creek. The 'loop' track would at best be left as a 'U' shape with either end terminating at the Jenkins Creek land reclamation area³⁰.

9.2 Background to the assessment of alternatives process

9.2.1 Overview

The NZTA guidelines for MCA³¹, are used as a foundation for the assessment to score each option against each chosen criteria and the consideration of weightings against each criteria.

An MCA is an appropriate tool for decisions which are large and complex, especially where these involve several conflicting objectives, or involve multiple and diverse stakeholders. The MCA provides a procedure where the decision-making process can be made open and transparent.

The process steps are identified below, but essentially consist of:

- Formulating criteria representing the environmental (social, economic and environmental) values associated with the decision.
- A relative 'scoring' of each criteria identifying whether the implications of the option would have a positive or negative consequence for the criteria, and the relative degree of consequence (between 3 and -3).

The MCA criteria were developed by the expert team, who have provided specialist input on their topic to the assessment of options, as well as then assigning a 'score' based on the implications of the option on that criteria.

9.2.2 Assessment Process

The assessment process adopted is:

- (1) Establish the decision context – the purpose of the MCA is to provide a multi criteria assessment between the options to achieve the objectives for the NoR³².
- (2) Identify the northern and southern extension options to be assessed (as outlined above) and provide sufficient detail to the experts such that they are able to formulate appropriate criteria and score the implications of each option. This has been undertaken in the Stage 1 Options Reports by the various members of the Project Team.
- (3) Clearly identify the criteria – and methodology for scoring these as have been developed by the various experts.
- (4) Scoring – describing the consequences of the options.

³⁰ Attachment J1. Boffa Miskell [7.1.2].

³¹ NZTA. August 2020. Multi-Criteria Analysis: User Guidance.

³² S171(1)(c).

- (5) Weighting – in this instance providing for a higher weighting to economic factors (Weighting Option 1) and environmental / social factors (Weighting Option 2).
- (6) Combine the weights and scores for an overall value.
- (7) Conclusion and results.

9.2.3 Criteria

The purpose of identifying criteria is to develop the means by which the options will be tested and compared.

Each criterion must be measurable, that is, it must be possible to assess at least in a qualitative sense, how well a particular option is able to perform **relatively** against the criterion to another option. This means being able to answer, ‘is it possible in practice to measure or judge how well an option performs on these criteria’.

The criteria against which each option has been assessed is set out below.

Value	Topic	Criteria
Economics / Feasibility	Implementation Risk	Constructability Risks
		Consenting Challenges
		Statutory Framework Requirements (i.e NZCPS, Regional and District Level Requirements)
	Economy	Construction Costs
		GDP and Employment Creation (including multiplier effects)
		Reliability, safety and resilience objectives
	Airport Logistics	Runway length
		Physical restrictions
		Airspace implications
		Integration with infrastructure and operations
	Geohazards	Ground conditions
		Settlement risk
		Liquefaction and seismicity
		Ground improvement
		Construction complexity
		Other natural hazards
		HAIL Sites
	Geo Coastal Hazards	Effects on coastal processes
		Effects on urban flood risk

Value	Topic	Criteria
Environment	Ecology	Vegetation and Habitat
		Freshwater
		Marine
		Avifauna
	Landscape	Natural Character
		Landscape (Physical and Character)
		Visual Effects (Public and private)
Social	Archaeology	Archaeology
		Historic Heritage
	Acoustics	Noise Sensitive Activities to the North
		Noise Sensitive Activities to the South
	Recreation	Nelson Golf Club
		Access to CMA / Perimeter Walkway

9.2.4 Analysis

The expected consequence of each option is assigned a numerical score on a strength of preference scale for each option for each criterion. In this way, more preferred options score higher on the scale, and less preferred options score lower. The scoring of criteria for this MCA has been based on NZTA guidelines, with a range from -3 to 3. With -3 having a significant adverse effect / substantial negative consequences in terms of the achievement of the outcome, and 3 having a significant positive effect on the project outcome.

The scores have been ascribed on the basis of identifying the impact or implication on the criteria being considered without mitigation, that is the impact in the absence of considering the effects management hierarchy. This is to provide a robust consideration between the Options without finessing as associated with the range of potential mitigation that may be able to be provided.

Effects / Outcome criteria	Scoring
Significant adverse effect / substantial negative effect on the project outcome	-3
Moderate / Major adverse effect	-2
Minor adverse effect	-1
Neutral / no change	0
Minor positive effect	1
Moderate / Major positive effect	2
Significant positive effect / achievement of project outcome.	3

Each of the experts have undertaken scoring of the options as against their relevant criteria. The outcome of the scoring is included in Attachments contained within the respective Options Assessments, **Attachments [G] – [M]**.

The MCA is established to evaluate the relative adverse effects / impacts associated with the proposed options. Accordingly, much of the scoring of each criteria is within the negative range, that is 0 for a neutral impact to -3 for a significant adverse effects or a failure to achieve the criteria. The exception is matters associated with Geo Hazards where the Stantec report identifies that matters such as ground conditions and technical settlement are generally favourable in terms of construction and aeronautical operations given that only feasible options have been considered.

9.2.5 Weighting and Conclusions

The full MCA is provided in **Attachment O**. Based on the MCA undertaken for the two options, the most appropriate option to achieve Nelson Airport’s objectives is the Northern Option.

	Option A – Northern Option	Option B – Southern Option
Economics / Feasibility	11	-24
Environmental	-9	-23
Social / Cultural	-18	-14
Totals	-16	-61

Table 4 – Nelson Airport Designation Objective Options. MCA Scores Aggregated

In addition, in order to test the robustness of the MCA, sensitivity tests have been applied.

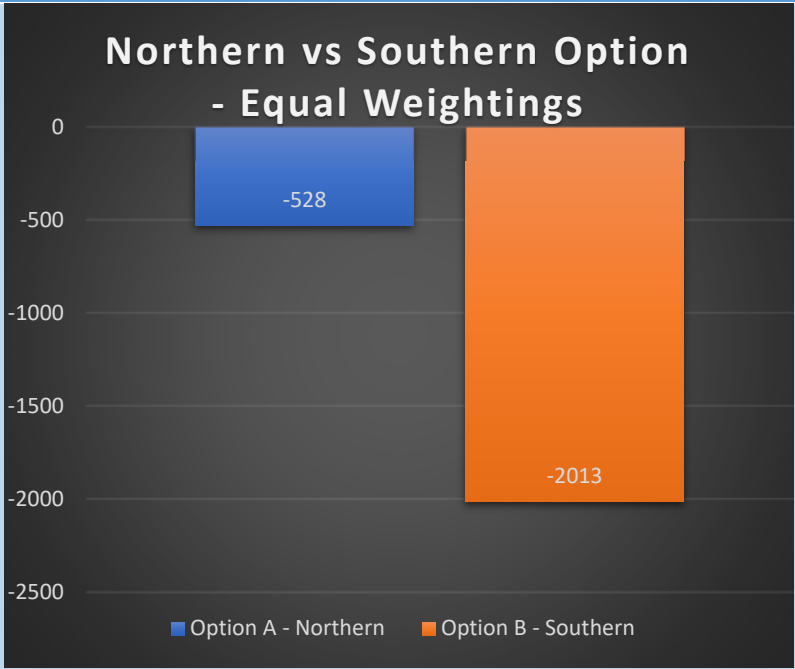
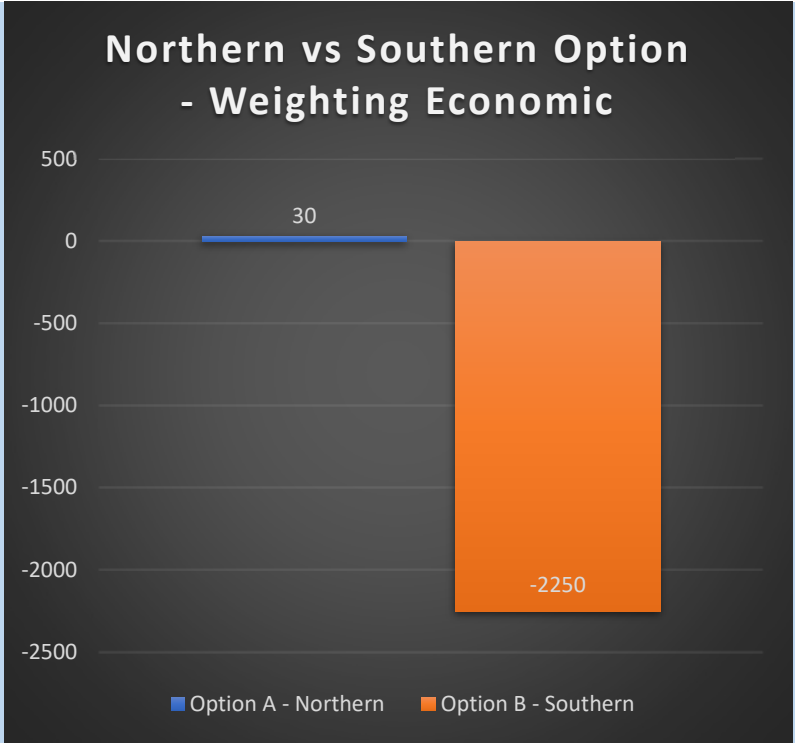
Applying sensitivity analysis explores the robustness of the result(s) and how sensitive they are to changes in the model through systematically varying the weights to see how they would affect the results. If a minor variation in one criterion significantly influences the result, that parameter should be subject to further scrutiny.

At the outset, it should be noted that across all criteria, with the exception of acoustic impacts and archaeology / historic heritage, the northern extension option is the more appropriate in terms of relative impacts on the environment (economic, environmental and social) values identified by the experts. This is not surprising given that the southern extension and associated reclamation and revetment would result in substantial feasibility issues and environmental impacts. In every sensitivity consideration below, the northern option is the more appropriate.

It is also noted that the NoR is accompanied by Proposed Conditions. An Outline Plan will also be required under s176A of the Act in due course. Mitigation and management through those processes will further reduce the implications of the Northern Extension option on the values identified.

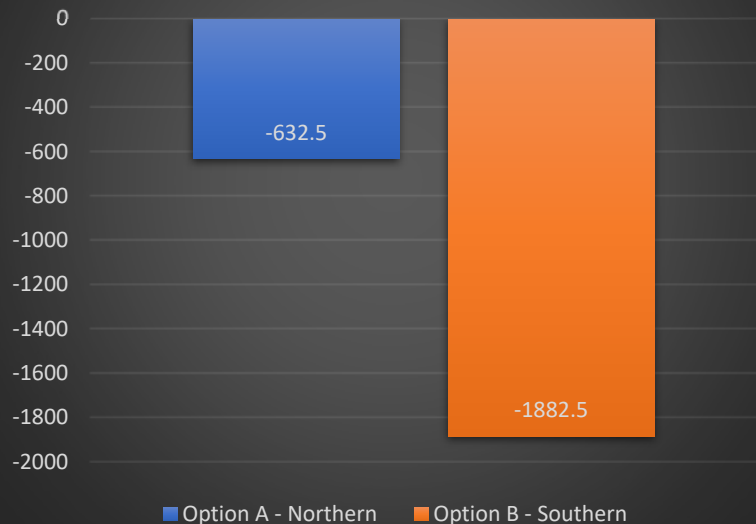
The respective sensitivity tests are identified below.

Table 5: Sensitivity Tests

Description	Results						
Option 1: Aggregate Raw Results	<p>Northern vs Southern Option - Equal Weightings</p>  <table border="1"> <thead> <tr> <th>Option</th> <th>Score</th> </tr> </thead> <tbody> <tr> <td>Option A - Northern</td> <td>-528</td> </tr> <tr> <td>Option B - Southern</td> <td>-2013</td> </tr> </tbody> </table>	Option	Score	Option A - Northern	-528	Option B - Southern	-2013
Option	Score						
Option A - Northern	-528						
Option B - Southern	-2013						
Every criterion and associated score are given equal value.							
Option 1(a) – Weighting Economics	<p>Northern vs Southern Option - Weighting Economic</p>  <table border="1"> <thead> <tr> <th>Option</th> <th>Score</th> </tr> </thead> <tbody> <tr> <td>Option A - Northern</td> <td>30</td> </tr> <tr> <td>Option B - Southern</td> <td>-2250</td> </tr> </tbody> </table>	Option	Score	Option A - Northern	30	Option B - Southern	-2250
Option	Score						
Option A - Northern	30						
Option B - Southern	-2250						
<p>Economic and Feasibility criteria are afforded a 60% increased weight (x 60). Economic criteria and social criteria are afforded a 20% weighting respectively (x20).</p> <p>The consequence is that the southern option - which has considerable construction and complexity issues results in a substantial decrease in appropriateness relative to the northern runway option.</p>							

**Option 1(b) –
Weighting Social and
Environmental**

**Northern vs Southern Option -
Weighting Social /
Environmental**

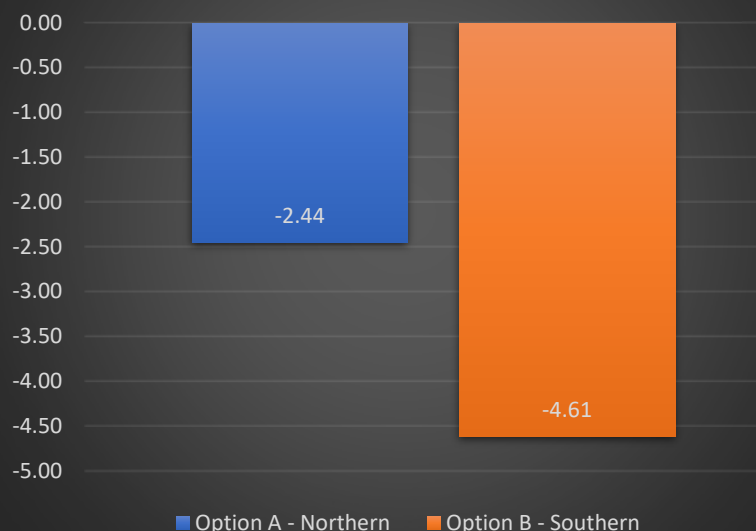


Economic and Feasibility criteria are afforded a 25% increased weight (x 25). Social and Economic criteria are afforded a 37.5% weighting (x37.5) - meaning that Economic and Social attributes equate to 75% of the overall weighting.

The consequence is that the southern option - which would result in substantial ecological and landscape issues represents a less appropriate option relative to the northern runway option.

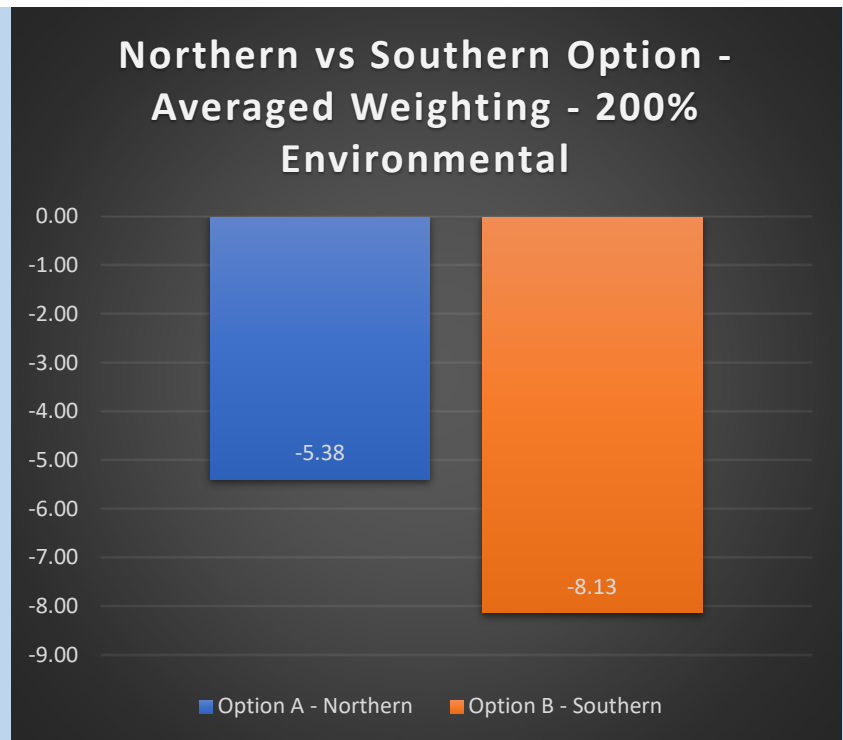
**Option 2 – Averaging
Economic, Social and
Environmental Values
(regardless of number
of criterion).**

**Northern vs Southern Option -
Averaged Weighting**



Values are aggregated and then averaged regardless of the number of criteria, for example Economic has 22 criteria thus the score is (aggregate Economic total / 22). Equal weight is applied across the Economic, Social and Environmental Values. The consequence is that the southern option remains the less preferable given both economic and environmental effects.

Option 2(a) - Values are equal – 200% Weight provided to Social and Environmental Values.



Values are aggregated and then averaged regardless of the number of criteria, for example Economic has 22 criteria thus the score is (Sum Criteria / 22). A 200% Weight (x2) has then been applied to Social and Environmental Values only.

The consequence is that the southern option remains the less preferable given both economic and environmental effects. However, the degree of relativity between the Southern and Northern Option reduces.

10 Assessment of Effects on the Environment

Section 171(1) of the RMA requires an assessment of effects of allowing the NoR. With respect of the PPC, clause 22 of Schedule 1 to the RMA requires a PPC to include a description of environmental effects that are anticipated. Given the integral nature of the PPC and the NoR, it is considered appropriate to combine the assessment of effects. In many respects, the nature of effects generated from the PPC and associated Airport Zone will largely replicate those enabled under the Industrial Zoning that applied to the PPC site under the operative NRMP. The differences in terms of bespoke noise exposure and landscape effects are specifically addressed in this assessment.

The following section of the report contains an assessment of the actual or potential environmental effects of allowing the NoR to alter Designations DAA1, DAA2 and DAA3. In considering the effects of the alterations to the Designations on the environment, the focus of the assessment must be on the effects of the alteration rather than a re-assessment of the designations in their entirety.

Where relevant, the assessment below identifies where these matters are addressed through reference to:

- proposed conditions to be affixed to the Designations DAA1, DAA2, and DAA3;
- matters that will be addressed through subsequent processes, including Regional Consents and also the s176A Outline Plan process; and
- through matters contained within the associated PPC, including Section 32 (Part 14 of this report).

10.1 Existing environment

The existing environment against which the effects are to be assessed have been set out in section 5.2 above.

10.2 Economic Effects

The economic effects of Nelson Airport have been considered in **Attachment L**.

Nelson Airport plays an important role in relation to the national and regional transportation network. It is one of the busiest airports in New Zealand, and the busiest without international flights.

In 2019, prior to the COVID-19 pandemic, 1,077,000 passengers used the Airport (departing or arriving), placing Nelson Airport as the equal 5th busiest domestic airport in New Zealand (with Dunedin)³³.

Whilst the effects of the COVID-19 pandemic, from March 2020 altered the aviation landscape as borders to New Zealand were closed, the domestic travel market in New Zealand has shown strong resilience throughout the pandemic in response to the progressive relaxation of travel restrictions. Nelson Airport has shown resilience through the Covid-19 pandemic, and it is

³³ Attachment L. Martin Jenkins [2.i]

anticipated that annual passenger numbers will steadily return to pre-Covid-19 levels of more than one million passengers per annum³⁴.

The economic contribution of Nelson Airport can be considered in three groups, being:

- Airport and precinct – operational and capital expenditure generated by the Airport, and the operations of companies using the Airport (airport-associated companies, including airport service, air services, air-related services, aircraft servicing, and maintenance and visitor services).
- Tourism and Trade – expenditure from visitors in the Nelson Tasman Region enabled by the Airport.
- Catalytic – business and population growth and productivity enabled by the Airport³⁵.

‘Nelson Airport (2018) was indirectly responsible for about 15% of all visitor expenditure in the Nelson Tasman region which accounted for 3.37% of the region’s GDP. In addition, the Airport enabled other businesses such as seafood producers, to make meaningful contributions to the region’s GDP and employment in their own right’³⁶.

The direct impact of capital and operational activity within the Airport precinct (in 2018) contributed some \$95.1million to the regional GDP, and some 1,714 full time jobs. Including indirect and induced impacts (multiplier benefits), the contribution to GDP was some \$178 million and 3,091 full time jobs³⁷.

The Airport fulfils a significant economic, commercial and business role, and is also a significant node of employment within the region. There are over 30 companies that operate in the Nelson Tasman region because of links through the Airport, including airport services (such as Airways Corp), air transport services (such as Air New Zealand, Originair, Golden Bay Air, Sounds Air), aviation related services (such as the Nelson Aviation College, New Zealand Aviation Academy, Nelson Aero Club), aircraft servicing and maintenance (including Air New Zealand Regional Maintenance) and visitor services (such as rental car operators).

Nelson Airport remains a primary gateway for national and international visitors to the region. The role of airports in enabling connectedness, combined with increasing dependency on air access and the isolation of the Nelson Tasman region, means that Nelson Airport is critical to the region delivering on its development and satisfying the needs of its communities for travel, freight and connectivity.

By 2050 passenger projections are expected to be in excess of some 1.8 million, travelling on some 39,000 passenger scheduled flights. General Aviation (GA) aircraft accounts for a further 12,000 flights. The predicted compound average growth rates are anticipated to be between 2% and 2.3% between 2025 to 2050³⁸. Importantly, it is noted that the proposed runway extension associated with the NoR is not, of itself to enable or facilitate this forecast growth, but the extended main runway at 1,510m and associated RESA will contribute to the resilience of these forecasts.

³⁴ Attachment M. Airbiz [4.iv].

³⁵ Attachment L. Martin Jenkins [3].

³⁶ Attachment L. Martin Jenkins [8].

³⁷ Attachment L. Martin Jenkins [9].

³⁸ Attachment M. Airbiz [Fig 4-3 and Fig 4-4].

NAL has made the decision to exclude jets from consideration in terms of servicing these passenger forecasts as associated with the NoR. Jets would increase the noise levels experienced by the adjoining community.

The proposed extension seeks to enable the removal of constraints associated with the existing short length of the current runway infrastructure (as associated passenger and payload restrictions in certain weather conditions), as well as provide an appropriate runway length to enable next generation green aircraft which are expected to progressively make up a reasonable extent of the aircraft fleet mix by 2050. As identified in Attachment G³⁹:

“The current focus in aircraft development is on fuel efficiency and sustainable alternatives to fossil fuels rather than optimising aircraft performance for short runways, such as at Nelson Airport.

New energy sources, aircraft, and powertrain developments are necessary to achieve sustainable aviation goals, especially for short range turboprop equivalent aircraft. Essential new aircraft types capable of serving Nelson’s high demand market are likely to be larger and heavier than current types for a given configuration. It is anticipated that these new aircraft will enter the New Zealand market in the near to medium term (2030-35).

Nelson Airport’s runway, which has limited capability, may not be long enough to sustain the volume of operations necessary to support future demand from these new aircraft types. An extended runway is the best way for Nelson Airport to prepare for next-generation aircraft”.

Nelson Airport is correspondingly both nationally and regionally significant infrastructure, having strategic importance for the Nelson urban area, wider region, and New Zealand more broadly. At the regional level, the Airport provides essential connectivity and intermodal facilities for the arrival and departure of domestic passengers and freight to and from the region.

Under the Civil Defence Emergency Management Act 2002 Nelson Airport is included in the list of Specific Entities in Schedule 1 – Part A which extends to the major trunk airports of Auckland, Wellington and Christchurch, and entities as defined in section 2 of the Airport Authorities Act 1966 including specified airports such as Nelson. Nelson Airport also therefore constitutes as a ‘Lifeline utility’ for the purposes of that Act and is a critical transport connection in times of disaster, including when land transport networks are impacted.

There are also other advantages provided by the Airport to the community, including provision of medical flight services, provision of a critical mass to support commercial helicopter operations, aircraft engine testing and maintenance, and Compass Swings, as well as the provision of flight training and education. Nelson Airport also provides a focal point in the region for civil and regional defence activities. Whilst these activities generate environmental effects, predominantly noise exposure, they contribute substantially to the mix of activities and economic value of the Airport to the region.

The ongoing operation and development of Nelson Airport will contribute to the continued growth and economic wellbeing by providing for the current and future needs associated with Airport activities, passenger and air freight connectivity, as well as providing increased resilience by removing payload restrictions, enabling next generation aircraft, and improved safety associated with airport operations.

³⁹ Attachment M. Airbiz [12] quoting “Future Sustainable Aircraft: An Outline of Potential Issues for Nelson Airport”, ELM Associates Ltd, 9 September 2022.

In addition, ensuring that Designations DAA1, DAA2 and DAA3 are updated and the Airport Zone is included in the NRMP to reflect contemporary Airport activities will mean that NAL will not have to incur unnecessary costs and delays associated with resource consent processes for activities that are anticipated and expected within modern airport operations (as embedded within the PPC provisions as ‘Airport Related Activity’ and ‘Aviation Activities’).

Designation DAA1 also provides economic certainty to NAL (and surrounding residents) as to the Airport’s clear intentions to develop and operate an extended runway length. Allowing the Airport Operator to plan ahead with more certainty also reducing planning and development costs overall, whilst ensuring environment thresholds and management is appropriately undertaken as outlined in the accompanying Proposed Conditions to the NoR.

10.3 Archaeology and Heritage

The effects of the NoR have been considered within **Attachment G2** – Underground / Overground.

10.3.1 Effects

In terms of Archaeological values, the assessment⁴⁰ establishes that, within the altered designation extent for DAA1, there is limited potential for intact pre-1900 archaeological sites to be present in this area, and it is likely that any sites that do remain are likely to be in a disturbed state. Although the possibility that undisturbed archaeological features may remain cannot be ruled out.

Whilst the extended designation extent for DAA1 (over the Nelson Golf Club) has not been levelled to the extent of the airfield under the operative Designation DAA1 (**Figure 3**), there are obvious signs of disturbance already.

The potential for unrecorded archaeological sites and features relates to pre-European Māori use of the northern runway extension area that remain in situ, and also that the land to the north of the current airport and existing runway was used extensively during World War II as a Royal New Zealand Air Force (RNZAF) station and camp. It is likely that there will be evidence associated with the WWII use of the extended designation area that will be of historical heritage value⁴¹.

It is not therefore possible to rule out the possibility of archaeological sites being found in that area but, where encountered, impacts are able to be managed through mitigation as associated with Proposed Conditions affixed to Designation DAA1.

Without mitigation, any effects on those sites would be negative, but could be significant (depending on whether or not the site has been previously disturbed), and permanent given that any sites within the footprint of the area required to be levelled for the runway extension will be destroyed and all associated archaeological values removed. This would result in a permanent serious or significant adverse effect on the archaeological values. However, as stated, the likelihood of this occurring is low and their destruction could be partially mitigated, but the adverse effect would still be permanent⁴².

⁴⁰ **Attachment G1.** Underground / Overground [9], **Attachment G2.** – Underground / Overground [pg 2].

⁴¹ **Attachment G2.** Underground / Overground [pg 2].

⁴² **Attachment G2.** Underground / Overground [Table 1].

In terms of **Historic Heritage**⁴³, the remaining scheduled building within the broader NAL site, will not be affected by the increased designation. However, there are historic heritage values associated with the use of this area as a WWII Airforce base. Structures associated with these activities, if present, are likely to be affected by the northern runway extension, however, these effects are able to be mitigated, though there may be some minor residual effects even with the mitigation in place.

10.3.2 Management

As identified in the archaeological assessment it is not possible to definitively state where, or even if, archaeological sites are located within Designation DAA1 as proposed to be altered through the NoR. All potential sites are buried below the ground surface and are not visible or otherwise detectable without invasive investigation techniques⁴⁴.

Where such sites are encountered during works, it is possible to mitigate the effects through archaeological recording (including accidental discovery protocols) of any features encountered during the course of the project and undertaken through an Outline Plan process, noting as identified in the assessment that this is mitigation of the loss of archaeological information, not the site itself.⁴⁵

The assessment⁴⁶ identifies a number of measures to address the potential adverse effects on archaeological and heritage values associated with works for the northern runway extension, including:

‘As a first principle, every practical effort should be made to avoid damage to any archaeological or heritage site, whether known, or discovered during any redevelopment activities’.

Recommendations also identify the need to obtain authorities associated with section 44 of the Heritage New Zealand Pouhere Taonga Act 2014. While this requirement exists under a separate legislative framework and is not strictly required to be stated as Proposed Conditions on the NoR, a condition has been proposed for the avoidance of doubt. In addition, there are recommendations as to matters which are best considered in terms of the requirements for assessments accompanying the Outline Plan once detailed design has been undertaken.

Accordingly, recommended condition DAA1.4.i requires that the *‘nature to which the location, depth and extent to which any Earthworks’* and any associated effects appropriately *‘identify, consider and manage Archaeological and historic heritage values; and cultural values’*. It should also be acknowledged that under the NRMP, Earthworks remains a regional rule under the Airport Zone as proposed by the PPC⁴⁷.

⁴³ **Attachment G1.** Underground / Overground [10.5]. **Attachment G2.** – Underground / Overground [pg 2].

⁴⁴ **Attachment G1.** Underground / Overground [10.4.1].

⁴⁵ **Attachment G1.** Underground / Overground [10.4.1].

⁴⁶ **Attachment G2.** – Underground / Overground [pg 3 – 5].

⁴⁷ Rule AIRPz.46.

10.3.3 Conclusion

The assessment identifies that the residual effect with mitigation is as set out below:

Effects		Extended Designation DAA1
Likelihood of effect	Archaeology	Low
	Historic Heritage	High
Magnitude of effect (without mitigation)	Archaeology	Significant, permanent
	Historic Heritage	Significant, permanent
Residual effect (with mitigation)	Archaeology	Less than minor, permanent
	Historic Heritage	More than minor, permanent

Table 6: Summary of potential effects to archaeological and historic heritage values⁴⁸

10.4 Noise effects

The noise effects of the NoR and assessment of the PPC provisions have been considered and outlined in **Attachment K2**.

10.4.1 Aircraft Operations and Noise – Overview of NZS6805:1992

NZS6805:1992 is the basis for land use provisions around New Zealand's commercial airports, including Nelson Airport.

The Standard recognises that aircraft noise can result in adverse noise effects on ASAN and can also cause reverse sensitivity effects on the airport. The dual responsibilities identified in the Standard also extend to compliance and monitoring requirements on the Airport operator⁴⁹.

The Standard prescribes two boundaries used to control aircraft noise in order to protect community health and amenity values. These are:

- the ANB generally a 65 dB L_{dn} contour within which new ASAN are to be prohibited⁵⁰; and
- an Outer Control Boundary (OCB) generally set at a 55dB L_{dn} contour which also seeks to avoid new ASAN but recognises that new ASAN could be allowed, as long as they are subject to appropriate insulation and ventilation requirements to ensure a satisfactory internal noise environment⁵¹.

In the Operative NRMP, the OCB is referenced as the 'Airport Effects Control Overlay' and is unaligned with the Standard as it applies at the 60dB L_{dn} contour.

These noise boundaries represent noise limits which the airport must not exceed⁵², as well as guidelines for land use planning⁵³.

⁴⁸ **Attachment G2.** Underground / Overground [Table 1].

⁴⁹ NZS6805:1992. Clause 1.4.4, Clause 1.5.1 Clause 1.7.1.

⁵⁰ NZS6805:1992 [Table 1].

⁵¹ NZS6805:1992. Table 2.

⁵² NZS6805:1992 Clause 1.4.4.1, Clause 1.4.4.2.

⁵³ NZS6805:1992 Clause 1.4 'Control Boundaries', Clause 1.4.3.8.

It is noted that noise levels between the ANB and OCB cannot be mitigated entirely through insulation and there will still be noise effects on the outdoor environment. This is a further reason for managing the density of adjoining residential areas, rather than relying entirely on insulation or ventilation requirements.

10.4.2 Aircraft Operations and Noise

10.4.2.1 Aircraft noise contours

The existing 'future' aircraft noise contours are shown in Map A4.1 of the NRMP as well as the e-plan maps. The operative aircraft noise contours are predicated on modelling and forecasts that are outdated. These need to be updated and inserted into the provisions of the NRMP to account for:

- ~ the updated forecast and associated aircraft fleet mix to 2050⁵⁴ referred to in the PPC and NoR as the 'Future Aircraft Noise Contours' (**FANC**); and
- ~ utilisation of updated noise modelling software⁵⁵.

In addition, the FANC also need to be updated to reflect the extended existing main runway length (provided through DAA1)⁵⁶, noting:

"...that using the outer envelope of the contours for the current and extended runway is appropriate to provide for the interim years before the runway is extended".⁵⁷

10.4.2.2 Designation DAA2

The operative ANB is shown in Map A4.1 in the NRMP.

Operative Designation DAA2 provides for the ANB at 65 dB L_{dn} for the purpose of exposure and compliance. The ANB also identifies the area of aerodrome operations where ASAN are prohibited⁵⁸, albeit allows alterations or additions to existing residential units where acoustic insulation is installed (DAA2.4iii).

Best practice is for the controls on ASAN to be located within the district planning provisions, rather than within the designation as they apply to third parties. Amendments to Designation DAA2 and the PPC provisions are proposed to reflect this approach.

This reflects the use of planning provisions to manage conflicting land-uses and allows for the consideration of activities within an objective and policy framework reflecting the health and well-being of our communities, and potential reverse sensitivity effects of locating ASAN near an airport.

This approach also provides greater certainty for other land users within the affected noise contours as to the restrictions on their properties.

The proposed controls on NAL's operations in the NoR for DAA2 are:

- a. Condition DAA2.3.i Noise from 'Aircraft Operations' as measured as a three month average 24 hour night weighted sound exposure does not exceed 65 dB L_{dn} at or

⁵⁴ Attachment M. Airbiz [Section 4].

⁵⁵ Attachment K2. Marshall Day Acoustics [6.1].

⁵⁶ Attachment K2. Marshall Day Acoustics [7.0].

⁵⁷ Attachment K2. Marshall Day Acoustics [7.0].

⁵⁸ NRMP DAA2 2.2.ii.

outside the ANB. Exclusions are provided including emergency aircraft landings as carried over from the existing operative Designation⁵⁹.

- b. Condition DAA2.3.ii relates to night aircraft movements (12 midnight to 6am). A single event noise limit of 95dB L_{AE} applies at residential sites outside the ANB during the hours of 12am to 6am⁶⁰. Exemptions for individual night time flights are able to be granted by application to the Nelson Airport Noise Environment Advisory Committee (**NANEAC**) as established and maintained under the NRMP, and those exclusions listed within the Definition of 'Aircraft Operations'.
- c. Condition DAA2.3.iii and iv Specifies compliance, and Monitoring and Reporting in accordance with an ANMR which sets out the procedures to demonstrate compliance with the noise limit.
- d. Condition DAA2.3v NMMP which sets out requirements for NAL in terms of defining how compliance is to be achieved for Aircraft Operations, Engine Testing and compass Swings, as well as the noise monitoring programme.
- e. Condition DAA2.3.vi which sets out NAL's obligations to the offer of acoustic treatment and/or ventilation measures under the AMP where lawfully established residential units in the Residential Zone become partially or wholly incorporated in either the 60dB L_{dn} or 65dB L_{dn} Annual Aircraft Noise Contour (**AANC**) as produced under DAA2.3iv.
- f. The Operative DAA2.4 requirements prohibiting ASAN are removed, with those requirements inserted within the planning provisions for the respective zones.
- g. Insert a replacement Condition DAA2.4 which sets out the configuration and role of NANEAC.

10.4.3 Operative Provisions – Controls on the Airport (Industrial Zone provisions) and Controls on ASAN

Within the Operative NRMP, the controls on Aircraft Operations and noise exposure from activities undertaken by Nelson Airport are contained within the Industrial zone, Chapter 10. These provisions include:

- a. INr.39 - duplicates the controls on Aircraft Operations in Designation DAA2.
- b. INr25 - provides controls in relation to aircraft engine testing.
- c. INr38 - controls noise from general industrial activities including airport activities other than aircraft noise and engine testing received in residential zones.
- d. INr37 - controls noise from general industrial activities between sites within the Industrial zone.

The Operative NRMP provisions also seek to manage and restrict land use within the AECO in the Residential (Chapter 7) and Industrial (Chapter 10) zones as set out below in Table 7.

⁵⁹ Exclusions within Definition of 'Aircraft Operations' – Chapter 2 Interpretations.

⁶⁰ The approach in NZS6805:1992 Clause 1.4.3.6.

Table 7 Operative NRMP Noise Controls

Overlay / Contour label	Noise level	Purpose	Provision reference
Airport Effects Advisory Overlay	55 – 60dB L _{dn}	Information purposes.	REr.66 Advisory only.
Airport Effects Control Overlay	60 – 65dB L _{dn}	Land use restrictions for ASAN, requirements for acoustic attenuation.	INr.71 (Industrial), SCr.69 (Suburban Commercial), REr.65 Acoustic Insulation of Buildings. REr.64 Minimum net area of 600m ²
Air-Noise Boundary (ANB)	65+ dB L _{dn}		Designation DAA2.4 'Restrictions'

Within the AECO, requirements are limited to acoustic controls (in the Industrial and Residential zones) and density controls (in the Residential zone).

10.4.4 PPC Provisions – Controls on noise exposure within the Proposed Airport Zone and consistent controls on ASAN across all zones

10.4.4.1 Activities Sensitive to Airport Noise

The PPC seeks to amend the controls on ASAN within the ANB and AECO by:

- inserting the updated ANB and AECO into the planning maps;
- amending the AECO from a 60dB L_{dn} contour, to the more appropriate 55dB L_{dn} contour;
- removing the Airport Effects Advisory Overlay from both the planning maps and text;
- inserting consistent provisions for the avoidance of new ASAN within the ANB and Airport Effects Control Overlay within the Proposed Airport Zone and operative Residential, Industrial, Open Space and Recreation, Suburban Commercial and Conservation Zone;
- retaining restrictions on site density within the ANB and AECO in the Residential zone; and
- amending provisions requiring the replacement or substantial alteration of existing and lawfully established ASAN within the ANB and AECO including requirements for acoustic attenuation and ventilation (as applied to the Residential, Industrial, Open Space and Recreation, Suburban Commercial and Conservation Zones).

The controls on ASAN within the ANB and AECO are proposed to be applied to all zones that are currently within those contours and those that could reasonably be included in the future (eg

suburban commercial zone). In other planning frameworks, these controls are often included by way of an overlay and those provisions would apply in addition to the underlying zone provisions. NAL has sought to work within the existing framework of the NRMP and rather than inserting a new overlay chapter has included the provisions in all relevant zones.

10.4.4.2 Engine Testing

In-situ, or ‘on the wing’ engine testing is essential to the safety of aircraft operations and the operational viability of commercial airports. Aircraft engines are required to be tested following scheduled or unscheduled maintenance prior to returning to service.

Nelson Airport has aircraft maintenance facilities on site, with the most significant one operated by Air New Zealand Ltd (ANZL). The maintenance operations help to underpin the economic vitality of the Airport. Maintenance, and associated engine testing including on turbo prop aircraft is often carried out overnight, when aircraft are not operating.

Engine testing typically generates high levels of noise for short periods of time.

Operative Plan Rule INr.25 sets out the following standards for managing engine testing noise, and amenity expectations in the adjoining residential zone as measured at the boundary of any residentially zoned site (Table 8).

Table 8: Engine Testing Requirements in the NRMP

Sound metric	Conditions
dBA Leq (8 hours)	55dBA Leq - 6am to 10pm.
(Averaged over 8 hours)	45dBA Leq – 10pm to 6am
dBA Lmax	75 dBA Lmax
	(i) between 6am and 10pm aircraft engine testing shall as far as practical be carried out within an effective noise enclosure;
	(ii) essential unscheduled engine testing is exempt from the noise limits for no more than 12 tests in any calendar year. The time, duration, and other essential details shall be recorded and reported as soon as practical to the Nelson Airport Noise Environment Advisory Committee.

The PPC seeks to roll-over the existing controls as applied within the NRMP into the new Airport Zone⁶¹ (with relevant definitions inserted into the NRMP as required), as well as ensure publicly available monitoring is undertaken as part of an ANMR as a condition of Designation DAA2. This approach is supported by Marshall Day Acoustics, including the 12 occasions per year when the noise limits may be exceeded for essential unplanned engine testing⁶².

10.4.4.3 Compass Swings

A Compass Swing is an aircraft maintenance activity to calibrate an aircraft’s compass. For Air New Zealand’s turbo-prop fleet, each aircraft undergoes a scheduled compass calibration every

⁶¹ Rule AIRPz.29.

⁶² Attachment K2. Marshall Day Acoustics [10.0].

two years. Compass Swings are also required following the replacement of certain components during maintenance⁶³.

Nelson Airport operates a specifically designed compass swing calibration site as located on the taxiway south of the Terminal towards the boundary with Jenkins Creek.

Compass Swings can only take place in daylight hours because they require a person using a compass outside the aircraft to be visible from the cockpit. The purpose of the site and calibration is to provide an operational area appropriate for achieving CAA Advisory Circular AC43-7 which provides acceptable means of compliance with standards for the calibration of compasses and the surveying of Compass Swing sites.

The calibration is for the purpose of ensuring confirmation of direct reading and remote reading magnetic compasses associated with aircraft. The process for calibration typically involves running the aircraft engine on a fixed site at reasonable levels, whilst manoeuvring the aircraft to varying compass 'swings'.

The procedure involves the use of specific instruments, the taking of up to 300 readings, and may take several hours to complete.

The requirements outlined in CAA Advisory Circular AC43-7 require (among other things) that the compass of an aircraft should be calibrated only on a site that has been surveyed as being level and free from magnetic disturbances (among other things).

Nelson Airport is one of the few Airports in New Zealand able to provide such a facility.

Under the operative NRMP, there are no specific controls or noise limits in relation to noise generated from compass swings undertaken at Nelson Airport. The activity is relatively infrequent and of limited duration.

NAL is seeking to ensure that compass Swings, and noise generated is able to be appropriately regulated through this PPC (and NoR) in order to provide certainty to NAL and adjoining sensitive residential activities that these activities are appropriately provided for. That approach is also supported by the acoustic advice provided by Marshall Day Acoustics⁶⁴.

The recommended provisions for compass swings to be inserted through the PPC⁶⁵ are set at a level that provides for the historical level of Compass Swing activity (predicated on acceptable noise exposure levels, the nature of exposure, and historical and ongoing airport activities).

The provision⁶⁶ is:

- a) *Noise generated from Compass Swings occurring within the Airport Zone (AIRPZ), shall:*
 - (i) *Take place between 7.00am and 10.00pm*
 - (ii) *Not exceed the following noise levels measured at any point on land zoned Residential.*

Time Period	Noise Limit
7.00am – 10.00pm (all days)	80 dB $L_{Aeq}(15\ min)$

⁶³ Attachment K2. Marshall Day Acoustics [11.0].

⁶⁴ Attachment K2. Marshall Day Acoustics [11.0].

⁶⁵ Rule AIRPz.30.

⁶⁶ Attachment K2. Marshall Day Acoustics [11.0].

	70 dB $L_{Aeq}(15 \text{ hour})$
Any consecutive 3 months	60 dB L_{dn}
Any consecutive 12 months	57 dB L_{dn}

- (iii) Except that essential Compass Swings following unplanned remedial work may exceed the 70 dB $L_{Aeq}(15 \text{ hour})$ limit on not more than 5 days in any calendar year (but must still comply with all other noise limits specified in the Table).

Note:

- For the purpose of assessing compliance with the noise limits in the Table, the cumulative noise from Compass Swings on approved Compass Swing pads shall be included.
- The Nelson Airport Noise Management and Monitoring Plan required under Designation DAA2 shall set out the location of Compass Swing pads and the procedure for monitoring and reporting compliance with the noise limits in the Table.

10.4.5 Effects

The effects of the changes to the Aircraft Noise Contours as a result of the extended runway are summarised below.

10.4.6 Airnoise contours - Annoyance

The assessment identifies the calculated annoyance effects based on the updated Airnoise contours, including as linked to the World Health Organisation (WHO, 2018) dose response relationship⁶⁷.

The runway extension will move the existing runway threshold closer to the existing Tāhunanui residential area. Accordingly, there is an increase in the number of people predicted to be highly annoyed by aircraft noise compared to the current (2019) noise levels (Table 9)⁶⁸.

Table 9: Number of people highly annoyed

Noise Level (dB L_{dn})	Number of people highly annoyed		
	Dose response relationship, i.e at 55 dB L_{dn} , 27% of the population are likely to be highly annoyed.		
	2019	FY50	Change
55-59	125	328	203
60-64	48	134	86
>65	0	47	47
Total	173	509	336

Importantly, Table 9 is a comparison of those likely to be highly annoyed against current noise levels, not those likely to be annoyed if Aircraft Operations were generating noise to the maximum extent permitted by the operative boundaries contained in the NRMP. Based on the

⁶⁷ Attachment K2 Marshall Day Acoustics [8.3].

⁶⁸ Attachment K2 Marshall Day Acoustics [Table 6].

number of existing houses as identified in the contour bands listed in Figure 5, fewer people would be annoyed under the proposed boundaries associated with the FANC, compared to the maximum Aircraft Operations extent provided under the operative NRMP⁶⁹.

The effects can be partially mitigated by acoustically insulating dwellings, however the impact on outdoor living cannot be mitigated.

In summary, the FANC would result in an increase in annoyance compared to current noise exposure levels, but less than the operative noise contours. Both the PPC and Designation DAA2.3.vi seek to introduce new requirements for acoustic mitigation for replacement or substantial alterations of existing residential units, or for NAL to offer acoustic treatment and/or ventilation for existing lawfully established ASAN in the Residential Zone as dependent on the AANC. These measures address the future noise effects of the runway extension.

10.4.7 Airnoise contours – Single event levels

The assessment identifies the change in single event noise for arrivals is predicted to be ≤ 2 dB L_{AE} which is an imperceptible increase⁷⁰.

For departures, the number of houses impacted by an appreciable, significant or substantial increase in single event noise due to the northern runway threshold moving closer to existing dwelling is shown in Table 10⁷¹.

Table 10: Increase in single event noise levels

Subjective Change	Increase in L_{AE} for ATR Departure	# Houses impacted
Appreciable	5 – 8 dB	21
Significant	9 – 12 dB	22
Substantial	> 12 dB	78

The northern runway extension results in a number of houses experiencing a significant or substantial increase in single event levels (L_{AE}) for departures. However, as shown in

Table 11, whilst for a number of properties there is an increase in L_{AE} for departures (Table 10), the extent of noise exposure does not exceed 95dB L_{AE} . For arrivals (there is an increase in the number of residential units impacted by noisy arrival events (nine additional units)⁷².

Table 11: Number of houses impacted by 'noisy events'

Noise Level (dB L_{dn})	Current runway # houses impacted	Extended runway # houses impacted
$L_{AE} \geq 95$ dB for departures	0	0
$L_{AE} \geq 95$ dB for arrivals	55	64

⁶⁹ Attachment K2. Marshall Day Acoustics [8.3].

⁷⁰ Attachment K2. Marshall Day Acoustics [8.4].

⁷¹ Attachment K2. Marshall Day Acoustics [Table 7].

⁷² Attachment K2. Marshall Day Acoustics [8.4].

The effects can be partially mitigated by acoustically insulating dwellings as outlined above, retaining the existing operative provisions that restrict flights between 12 midnight to 6am and application of the single event noise limit of 95dB L_{AE} at residential sites outside the ANB during the hours of 12am to 6am.⁷³

10.4.8 Airnoise contours – Number of houses within the Airport Effects Control Overlay and ANB

Table 12 illustrates that overall, future aircraft noise around Nelson Airport is predicted to affect fewer houses compared with the operative NRMP boundaries due to a quieter modern aircraft fleet, albeit there would be an increase in the number of houses inside the highest noise band (i.e. 36 more houses inside 65 dB L_{dn}).⁷⁴

Table 12: Number of dwellings in the airport noise contours

Noise Level (dB L_{dn})	Operative NRMP	Amended Airnoise contours (including extension)	Change
55-59	707	439	-268
60-64	300	134	-166
65-69	16	40	+24
Total	1023	613	-410

NZS6805:1992 recommends that existing residential units exposed to 65 – 70 dB L_{dn} are offered insulation to mitigate the indoor noise effects. As above, the PPC provisions and Designation DAA2.3.vi seek to introduce a range of measures to manage these effects, including requirements on NAL to offer mitigation and ventilation as dependent on the AANC.

10.4.9 Management

The Operative NRMP includes land use controls associated with Nelson Airport's noise boundaries, and a series of Proposed Conditions with DAA2 as to compliance and management with noise exposure from Aircraft Operations.

The approach identified in the NoR and associated PPC seeks to: align more directly with the approach set out in NZS6805:1992; insert updated FANC and a consistent set of standards and definitions as associated with ASAN; and to ensure both an integrated and appropriate suite of provisions to manage aircraft operation noise, and noise exposure from engine testing and Compass Swings at Nelson Airport with surrounding land use.

The approach primarily within the PPC is to:

- avoid new ASAN within the ANB and AECO, as associated with the FANC. The consenting threshold is set at prohibited for new ASAN within the ANB on the basis of Table 1 within NZS6805:1992;

⁷³ The approach in NZS6805:1992 Clause 1.4.3.6.

⁷⁴ Attachment K₁ Marshall Day Acoustics [8.2, Table 5].

- provide for the replacement and substantial alteration of existing and lawfully established ASAN within the ANB and AECO, as subject to achieving 40dB L_{dn} indoors in Habitable Spaces;
- provide certainty in the plan provisions associated with the Airport Zone, including introducing regulation for Compass Swings which are an existing activity within the purpose of the Designation DAA1 but is not controlled by noise limits in the Operative NRMP; and
- The approach primarily within the Designation DAA2 is to provide an updated and integrated approach to monitoring, reporting and compliance with the ANB, including the provision of an AMP and preparation of a NMMP.

10.4.9.1 PPC - Additional Land use controls

In addition to the amended land use controls above, the proposed updates in the PPC also include:

- amendments to require a reduction in the indoor noise criteria for acoustic insulation in Habitable Spaces as associated with Aircraft Operational noise from 45dB L_{dn} to 40dB L_{dn} to reflect best practice;
- updates to Appendix 19 to align with the revised AECO and to simplify the minimum construction requirements; and
- updates to mechanical ventilation standards to accompany the acoustic insulation requirements in Appendix 19.1.

10.4.9.2 DAA2 – Acoustic Mitigation Programme

The approach to acoustic mitigation is set out in the Proposed Conditions for Designation DAA2, and which place a range of obligations on NAL as the requiring authority.

In addition, the Proposed Conditions require NAL to implement an acoustic mitigation programme that aligns with best practice for airports in New Zealand. There is currently no existing requirement in NRMP for NAL to implement such a programme and the one now proposed has been carefully considered and developed by NAL with its expert team to ensure it is fit for purpose.

The acoustic mitigation programme includes NAL funding acoustic and ventilation treatment within the 60dB L_{dn} FANC for existing lawfully established residential units in the Residential Zone. Mitigation offers would be made to residents when the AANC reaches the 60dB L_{dn} threshold at their dwelling:

- For houses within the ANB, NAL will offer acoustic insulation treatment to achieve 40 dB L_{dn} in habitable spaces and mechanical ventilation to maintain indoor air quality with windows closed.
- For houses within the AANC to 60 dB L_{dn} but outside ANB, NAL will offer mechanical ventilation to habitable spaces to maintain indoor air quality with windows closed which reduces noise ingress. This is proposed to be fully funded by NAL.

Importantly, the FANC does not reach a threshold of 70 dB L_{dn} at existing houses. At that threshold NZS6805:1992 would recommend such houses are purchased.

Accordingly, the proposed acoustic mitigation programme as embedded in Designation DAA2, in conjunction with the proposed noise controls introduced through the PPC are considered to be an appropriate method of mitigating noise from Airport operations at Nelson Airport.⁷⁵

10.4.10 Conclusion

Based on the above:

- ~ Anticipated noise effects as associated with Designation DAA1 and DAA2 will, at a wider community level be similar in nature, scale and extent to those anticipated under the existing environment (under the operative NRMP provisions), whilst overall future aircraft noise around Nelson Airport will affect fewer houses compared to the Operative boundaries, the runway extension would result in 36 more houses inside the ANB⁷⁶;
- ~ For residents within the AECO and ANB:
 - o adverse effects on indoor amenity will be sufficiently managed by the Proposed Conditions contained within DAA2 to an extent considered to be an appropriate response to mitigate the effects of the runway extension and future aircraft operations in Nelson⁷⁷. These effects are considered to be no more than minor;
 - o adverse effects on outdoor amenity cannot be mitigated through acoustic insulation. Under the proposed boundaries for Nelson Airport, the maximum level of noise exposure at a number of existing properties would be 66 dB L_{dn}. It is considered that the aircraft noise effects on outdoor amenity for residents inside the ANB would be undesirable but not unreasonable⁷⁸. These effects, on outdoor amenity as associated with a limited number of households are considered to be more than minor, but not significant.
- ~ The individual and cumulative effects of the NoR and PPC on peoples' health, safety and wellbeing will be consistent with the guidance in NZS6805:1992. That standard remains the applicable standard for balancing and managing competing values and effects associated with airport activity. These effects are not significant.

An appropriate effects management framework remains in the NRMP with regard to engine testing, and the current absence of express limits in the NRMP with regard to Compass Swings is responded to. Under the provisions proposed in the Airport Zone, the effects on proximate residents will be reasonable.

10.5 Landscape and Natural Character Effects

The effects of the NoR have been considered within **Attachment J3** – Boffa Miskell.

10.5.1 Effects

The Airport's position has long influenced decisions on City form and growth; that influence is particularly prevalent in terms of connections with the supporting transport infrastructure, and

⁷⁵ **Attachment K2.** Marshall Day Acoustics [9.2].

⁷⁶ **Attachment K2.** Marshall Day Acoustics [13].

⁷⁷ **Attachment K2.** Marshall Day Acoustics [13].

⁷⁸ **Attachment K2.** Marshall Day Acoustics [13].

the manner in which land uses, particularly Industrial land uses to the east, have transitioned and established around the Airport.

The existing environment from a landscape and natural character perspective therefore contains a level of modification that is reflective of a modern larger scale regional airport. Views toward the Airport, particularly towards the recently upgraded substantial terminal building are influenced by existing and permitted buildings and structures. Any further development enabled through the NoR would be viewed together with this existing activity from all perspectives and viewing angles.

Notwithstanding the built form already present at the Airport, the Airport shares its boundaries with the CMA associated with Waimea Inlet and Jenkins Creek, sensitive activities such as residential land uses, and open space as associated with the Nelson Golf Course to the north.

In terms of Natural Character Effects, the assessment⁷⁹ identifies that at a broader ‘character-area’ level, the Tāhunanui Coastal Territorial Area (within which the proposed northern runway extension is proposed to be located) has ‘moderate-low’ levels of natural character. This is principally due to the high levels of modifications found within the vast majority of this CTA. At a local level, the natural character rating is also considered to be ‘moderate-low’, due to being highly modified with minimal intact abiotic and biotic systems apparent.

The proposal, as associated with that part of Designation DAA1 extended to the north to partly occupy the existing Nelson Golf Club is, at a macro level, contained within a relatively modified coastal environment due to existing airport operations. The underlying landform on which the extension to the main runway is proposed, currently accommodates the existing golf course and channelised sections of Maire Stream tributary. Whilst existing landform undulations remain, these have been modified as a result of its current use. There are biotic values associated with the Maire Stream tributary, with the remainder of this area otherwise devoid of coastal vegetation and primarily covered in exotic grasslands. Modifications prepared through the NoR to create the paved runway extension and grassed northern RESA will be consistent with the areas’ current setting and context adjoining the existing operational airport.

The proposed extension to the main runway is consistent with the existing level of modifications already present at Nelson Airport. In this regard, the proposal can be absorbed into the relatively modified terrestrial coastal environment accommodating the existing golf course and as associated with Maire Stream which will require piping or relocation as a consequence.

There is overall a ‘moderate-low’ level of natural character identified at a local context, which would decrease to ‘low’ following construction of the proposed northern runway extension given the further modifications which would result. However, the proposed extension to the main runway is considered to have a low (adverse) effect on the natural character attributes at a local level.

In terms of **Landscape Effects**, the assessment⁸⁰ considers that the northern runway extension and associated RESA, would be generally in character with the surrounding landscape. The flat, exotic grassland currently within the golf course will largely be retained through the RESA and grassed airfield surrounding the northern runway extension. The presence and visibility of aircrafts within this landscape is part of the existing environment.

The physical landscape will be altered as a result of the piping or relocating of the Maire Stream tributary. The assessment assumed the Maire Stream tributary would be piped as this

⁷⁹ Attachment J2. Boffa Miskell [6.1].

⁸⁰ Attachment J2. Boffa Miskell [6.2].

represents as ‘worst-case’ scenario. If the Maire Stream tributary was instead realigned, this would have better outcomes from a landscape and natural character perspective. The overall level of landscape effect would be moderate (adverse, at a site scale) assuming the Maire Stream tributary would be piped. An overall low-moderate (adverse) effect would be experienced at a broader macro level scale⁸¹.

However, should the Maire Stream tributary be realigned outside of the RESA and kept as an open stream corridor rather than piping, the magnitude of adverse effect on landscape and natural character values would be reduced.

The effect analysis accounts for the ‘open space’ of a grassed airfield (RESA) as likely to provide a similar amenity to that as currently available to nearby residents.

In terms of **Visual Effects**⁸², visual catchment for the northern runway extension is generally contained to the local area with the exception of long-distance (approximate 1.8kms away), elevated views from the Port Hill Ridge. The viewing audiences range from private residential dwellings that border the northern extension area to the north and east through to users of the Nelson Golf Club, Airport Perimeter Walk and nearby roads.

Considering visual effects from public locations, the assessment records that with the exception of users of the Nelson Golf Course, a very low (neutral) visual effect will be experienced from users of the Airport Perimeter Walk, Great Taste Trail and Water users of Jenkins Creek and Waimea Estuary – largely this is due to proximity to existing airport operations and activities which already form the visual experiences of these parties. Users of the Nelson Golf Club (as reconfigured) would experience a moderate adverse effect on the basis of delineating the extension areas edges through security fencing, and a more proximate runway / taxiway pavement.

In terms of visual effects from private locations, the visual effects range from low (adverse) to high (adverse) varying based on proximity to the nature of the view, proximity to the RESA and proximity to the runway extension itself coupled with the parallel taxiway and additional runway lighting. Only a few private residents would have views of both the runway extension, additional lighting and RESA within the same view.

10.5.2 Management

The existing Industrial zone provisions in relation to building setbacks and landscaping have been ‘rolled over’ into the Airport Zone and are therefore considered to provide an appropriate buffer to built form at the Airport.

However, as the anticipated activities relate to the extension of the runway, as well as additional landform modifications and earthworks, a number of Conditions are proposed to be included on Designation DAA1 to manage the effects from a landscape and natural character perspective.

Boffa Miskell has identified that there are several matters which may impact the degree of landscape and natural character effects as experienced at the interface with Nelson Airport. Boffa Miskell consider that the methods of managing those effects are most appropriately determined at detailed design or during the future regional consenting processes for the project (i.e. the piping or realignment of Maire Stream tributary)⁸³.

⁸¹ Attachment J2. Boffa Miskell [6.2].

⁸² Attachment J2. Boffa Miskell [6.3].

⁸³ Attachment J2. Boffa Miskell [7.0].

Recommended Proposed Conditions to Designation DAA1 as included in DAA1.4.i contains a specific condition related to earthworks, and that the *'nature to which the location, depth and extent to which any Earthworks'* and any associated effects appropriately *'identify, consider and manage Amenity values.*

There is also a recommendation for a Landscape and Design Plan (LDP) to be prepared and provided with any relevant Outline Plan to be affixed to the NoR and has been included accordingly in DAA1.⁸⁴

10.5.3 Conclusion

Based on the above, it is concluded that:

- ~ Anticipated effects on Landscape and Character as associated with the amended designated extent of DAA1 will, at a wider community level be similar in nature, scale and extent to those anticipated and represented by the existing Airport.⁸⁵
- ~ Effects on natural character are low and largely relate to the management and treatment of Maire Stream tributary. These effects will be appropriately managed though subsequent regional consenting processes associated with earthworks, realignment and / or culverting.⁸⁶
- ~ For residents immediately to the north of the Airport, the 'open space' of a grassed airfield (RESA area) is likely to provide a similar outlook that is currently available to nearby residents⁸⁷. The visual effects range from low (adverse) to high (adverse), with the level and nature of visual effects vary on the nature of the view, proximity to the RESA and proximity to the runway extension⁸⁸.
- ~ For users of public open space, with the exception of users of the reconfigured golf course (moderate, but not significant), adverse effects will be less than minor, albeit the Airport Operator will need to consider realignments to walkways on Airport land that are impacted by the NoR⁸⁹.

⁸⁴ Attachment J2. Boffa Miskell [7.0].

⁸⁵ Attachment J2. Boffa Miskell [8.0].

⁸⁶ Attachment J2. Boffa Miskell [8.0].

⁸⁷ Attachment J2. Boffa Miskell [8.0].

⁸⁸ Attachment J2. Boffa Miskell [6.3.2].

⁸⁹ Attachment J2. Boffa Miskell [6.3.2].

10.6 Effects on Ecology

The ecological effects of the NoR have been considered within **Attachment H2** – Boffa Miskell.

10.6.1 Effects

In terms of Effects on Vegetation and Habitats, the assessment⁹⁰ identifies that works associated with the NoR would result in minor adverse effects, due to loss of 0.17 ha of indigenous dominated saltmarsh vegetation along Maire Stream tributary. While this would represent a low level of effect, it is one that would still require consideration in terms of the effects management hierarchy as the saltmarsh habitat is a natural wetland of moderate ecological value. All other habitat within the proposed runway extension area is of negligible ecological value. Rank exotic grass habitat within eastern areas of the extended Designation DAA1 may provide habitat for skink.

Freshwater values are predicated largely on the potential loss of habitat associated with the Maire Stream tributary. The stream's ecology value is High, supporting indigenous freshwater fish species, including longfin eel (At Risk), banded kōkopu (At Risk) and probably provides spawning habitat for inanga (At Risk)⁹¹.

As with the landscape and natural character assessment, the assessment assumes that the Maire Stream tributary will be piped (rather than realigned) as this represents the 'worst-case' scenario from an ecological effects perspective. This ensures that the assessment of effects undertaken for the NoR has been carried out on a conservative basis. At the Waimea scale the reduction in values through piping the Maire Stream tributary would be minor, without mitigation⁹² and at a project scale it would be Low-High (loss of 7.7%-16.2% freshwater habitat). The effects associated with the Maire Stream tributary will be considered within the effects management hierarchy under the NES-F and at the future regional resource consenting processes.

There are no material effects on marine ecology⁹³, assuming that appropriate consents, including construction related stormwater are obtained.

Lastly, in terms of Avifauna effects⁹⁴ there will be a minor effect on avifauna species due to a potential permanent loss of foraging and roosting habitats, as well as increased disturbance of coastal species. The magnitude of that effect is:

- Terrestrial: permanent loss of foraging and roosting for terrestrial native *Not Threatened* and *Introduced* species, as well as for NZ pipit and bush falcon – Negligible magnitude of effect.
- Freshwater: no breeding habitat for freshwater species within the extension footprint, and species recorded were traversing the site – Negligible magnitude of effect
- Coastal: no direct loss impact on coastal environment, but potential additional disturbance of coastal avifauna communities that are already subject to high levels of disturbance from current activities – Negligible magnitude of effect.

In summary, the works associated with the NoR would result in increased losses of vegetation and terrestrial habitat, however, the values represented by such terrestrial habitat is largely exotic and of negligible ecological value. There would also be minor adverse effects on freshwater ecology

⁹⁰ **Attachment H2.** Boffa Miskell [pg 4].

⁹¹ **Attachment H1.** Boffa Miskell [5.1.2].

⁹² **Attachment H2.** Boffa Miskell [pg 5].

⁹³ **Attachment H2.** Boffa Miskell [pg 5].

⁹⁴ **Attachment H2.** Boffa Miskell [pg 5].

due to loss of c.475 m (and potential loss of ecological connectivity to a further 500m) of Maire Stream tributary⁹⁵, which likely supports At Risk freshwater fish species and may provide inanga spawning habitat.

However, as noted above, this assessment has assumed that Maire Stream tributary would be piped or culverted, and has not considered realignment of the waterway and recreation of inanga spawning habitat.

No significant adverse effects on marine ecology are expected, as robust construction erosion and stormwater control and operational stormwater treatment are assumed to be in place. Minor adverse effects on avifauna species are anticipated, due to permanent loss of foraging and roosting habitats for terrestrial and freshwater species, and increased disturbance of At Risk and Threatened coastal species.

10.6.2 Management

In order to manage the effects on ecological values, there are consenting requirements (such as through the retention of regional rules as applied within the Proposed Airport Zone or NPS-FM and NES-F) that apply, including those associated with construction and operational stormwater, culvert design, and the application of the effects hierarchy as associated with any regional consents associated with the Maire Stream tributary. There is also recognition in the assessment of requirements under other statutes (such as an authorisation given by the Director-General of the Department of Conservation under section 53 of the Wildlife Act 1953 in relation to any protected wildlife).

Insofar as managing the effects on ecological values at a district level, conditions are proposed to manage works through the Outline Plan process.

10.6.3 Conclusion

Based on the above, it is concluded that most of the proposed extension area (altered Designation DAA1) comprise exotic grassland with a small area of high ecological habitat and freshwater values associated with Maire Stream tributary being the primary focus for subsequent works and implementation of the effects management hierarchy⁹⁶ (with a preference for relocation).

Residual effects will be addressed through additional surveys undertaken prior to earthworks commencing on the proposed runway extension and through subsequent regional resource consenting processes. Effects are considered to be able to be mitigated to a low level of effect (Maire Stream tributary only and at a Waimea Inlet scale)⁹⁷.

⁹⁵ Attachment H2. Boffa Miskell [pg 6].

⁹⁶ Attachment H2. Boffa Miskell [5].

⁹⁷ Attachment H2. Boffa Miskell [5].

10.7 Effects associated with Geo Hazards and Geo Coastal matters

The effects of the NoR have been considered within **Attachment I2** – Stantec.

10.7.1 Effects

The Options Assessment⁹⁸ identifies no substantial effects associated with the proposed works that would be enabled through the NoR and that the ground conditions are largely to be well draining, with low settlement effects.

The Geotechnical Effects Assessment⁹⁹ identifies the most significant geotechnical effects associated with the proposed works are related to earthworks activities required to construct the extension of the existing main runway. The details related to these earthworks activities will be determined during detailed design and will be subject to subsequent regional resource consenting processes and the Outline Plan process under s176A RMA.

Drainage associated with additional pavement, as well as stormwater management during the construction process will also be the subject of detailed design and furthered through the future regional consenting process.

The Maire Stream tributary intersects with the proposed northern RESA and will need to be either realigned around the outside of the RESA or potentially culverted, to allow for conveyance of water, sediment and (as identified in the Ecological assessment connectivity to the upper reaches), with the same efficiency as the existing stream. If realignment of the Maire Stream tributary occurs, the construction and operation of the northern runway extension will have no net effect on stormwater after mitigation¹⁰⁰. Culverting the stream has the potential to result in greater adverse effects from an engineering perspective when compared to realignment, but this is a matter that will need to be considered and resolved through detailed design and the subsequent regional consenting processes.

There is recognition that Nelson Airport (and the wider area) is in an area of high seismicity although there are no known active faults under the site. The extended Designation DAA1 extends into the Tāhunanui Liquefaction Study area (Tonkin and Taylor 2013), the effects of which have been quantified in their report and can be accounted for in subsequent works and development. Summarily, the wider area including the Airport is contained within the Civil Defence Tsunami Evacuation Zone. As two HAIL sites are identified at the northern end of the Proposal Site (10894 and 10087), works associated with such are regulated by the NES - Assessing and Managing Contaminants in Soil to Protect Human Health (Resource Management Regulations 2011).

In terms of effects associated with coastal processes, the extended designation has no effects on coastal risk or coastal processes¹⁰¹.

10.7.2 Management

Stantec has identified a number of Geotechnical and Flood hazard sustainability matters relating to the development of airport infrastructure as associated with the proposed northern runway extension and altered extent of Designation DAA1 from a Geotec and Flood Hazard perspective¹⁰². These matters are all matters to be addressed through detailed design, construction management and subsequent regional consenting processes.

⁹⁸ **Attachment I1.** Stantec [3.0].

⁹⁹ **Attachment I2.** Stantec [pg 2].

¹⁰⁰ **Attachment I2.** Stantec [pg 2].

¹⁰¹ **Attachment I2.** Stantec [pg 2].

¹⁰² **Attachment I2.** Stantec [pg 2].

In this regard, natural hazard risks associated with the runway extension will be appropriately managed and addressed through the works being designed and constructed to standards that will minimise damage from design seismic events.

In terms of flood risk, extreme weather and climate change, standards applied to the design of the runway and taxiway will extend the existing infrastructure, and be informed with future hydrological studies to inform runway and stormwater design to reflect an appropriate approach to the effects of climate change. The Stantec Effects Assessment identifies that realigning the Maire Stream tributary presents opportunities for a reduction in Geotechnical and Geohazard effects than culverted as associated with both flood risk and sediment.

To capture the broader stormwater and flood risk matters raised in terms of earthworks, the recommended Proposed Conditions as included in DAA1.4.i requires that the *'nature to which the location, depth and extent to which any Earthworks'* and any associated effects appropriately *'identify, consider and manage flood risk and stormwater management'*. Earthworks remains a regional rule under the Airport Zone as proposed by the PPC¹⁰³.

10.7.3 Conclusion

Based on the above, it is concluded that the Geo Hazard and Geo Coastal processes associated with the NoR (and the proposed runway extension) do not provide any material technical challenges or effects associated with construction or operation. Specific design elements will be addressed through the subsequent detailed design and planning permission (s176A Outline Plan, regional consents, building consents) phase.

There are no geotechnical issues that would make the site unsuitable for development in extending infrastructure associated with Nelson Airport. The earthworks and geotechnical effects of the proposal are considered to be less than minor.

10.8 Transport and Traffic Effects

These matters have been considered within **Attachment N – Stantec**.

10.8.1 Effects

As a key landuse activity within the Nelson region, it is important that the land transport linkages connecting to the Airport enables safe and efficient movement for a variety of transport modes, recognising that the Airport needs to provide for growth.

Trent Drive connects with the external roading network at Quarantine Road (a Principal Road), which in turn connects with State Highway 6 (SH6), which provides a primary route between Nelson CBD and Richmond. Other roads in the immediate vicinity also support access to the Airport, including via Bolt Road and Parkers Road.

There are numerous cycling and pedestrian networks in the vicinity of Nelson Airport, some of which have gaps in infrastructure provision so are not yet fully connected. However, there are at present no scheduled bus services.

Based on the forecast annual passenger forecasts for the period through to 2050, in conjunction with wider area growth in travel demand as anticipated by the Nelson Future Access project undertaken by Waka Kotahi and NCC (which incorporates the forecast growth rate at the

¹⁰³ Rule AIRPz.46.

Airport) there is expected to be an increase in congestion particularly on SH6 which supports access to the Airport. Most of this change is attributable to wider growth.

However, the Business Case set out in the Nelson Future Access seeks to set out a programme that will promote multi-modal transport options (walking, cycling and public transport), enabling mode shift from private vehicles that will minimise the increases in congestion. There will be a staged package of improvements for the region's public transport services¹⁰⁴ which will be a notable change from current operating conditions. The Nelson Future Access project does not provide for additional major arterial road capacity¹⁰⁵ except to support safe and efficient side road access to major roads. The various plans include acknowledgement of future improvements to the SH6 intersections at Quarantine Road and Parkers Road which will support the safety and reliability of vehicle access to the Airport¹⁰⁶.

The Long Term Plan identifies a number of specific projects proposed for the roads connecting to the Airport, to improve safety for all modes of travel¹⁰⁷. All of these changes are external to the site and will be a function for the road controlling authority to plan for as traffic patterns change over time.

Overall, the forecast growth levels associated with activities at Nelson Airport are already contained within respective modelling and planning undertaken by Waka Kotahi and NCC. Whilst there will be changes in travel demand to and from the airport via the local transport network, this is attributable to wider growth. Changes to the local road network to support efficiency, effectiveness and safety will likely be necessary as the operating conditions of the roads change to reflect their classified function (as Principal and Collector Roads) of providing for through traffic as well as the existing access function. This will be a standard matter for the road controlling authority to address as transport conditions change over time.

Overall, Airport growth is already being considered within wider transport network planning. Regional and passenger growth is likely to see a comparable rate of change in travel demand to and from the Airport via the local transport network. This growth is forecast regardless of the of the NoR, and as such the direct land transport related effects of the NoR is negligible¹⁰⁸.

There is a role to play for the Airport Operator in facilitating multi-modal options as appropriate – focusing on ensuring internal Airport infrastructure facilitates public transport connection, noting limitations associated with the function of the Airport and walking and cycling for the purposes of facilitating aviation passenger transport.

10.8.2 Management

None required through the NoR or PPC provisions.

10.8.3 Conclusion

The assessment demonstrates that significant planning for the future transport system has occurred that will support travel demand growth at the Airport and therefore no additional constraints or requirements are sought to be imposed as Proposed Conditions to the NoR or PPC provisions.

¹⁰⁴ Attachment N. Stantec [8.3].

¹⁰⁵ Attachment N. Stantec [8.0].

¹⁰⁶ Attachment N. Stantec [9].

¹⁰⁷ Attachment N. Stantec [10].

¹⁰⁸ Attachment N. Stantec [12].

10.9 Cultural effects

As outlined in Section 12, Nelson Airport continues to engage with iwi. Nelson Airport acknowledges the importance of understanding the cultural values of the area and potential effects of the NoR and PPC on those values, and considers it is most appropriate that those values are identified, and effects articulated by iwi. The following section is limited to archaeological and cultural values as they are identified in planning documents.

The New Zealand Archaeological Association's Site Recording Scheme does not identify any archaeological sites or other items of historic heritage or cultural value across the runway extension area.

In terms of the NRMP, neither existing Designation DAA1 nor the proposed runway extension area is the subject of the Archaeological Overlay (Policy DO4.1.5) which denotes a high density of sites of significance to Iwi.

Nelson Airport is not aware of any areas identified by mana whenua as requiring special protection or culturally significant sites in the vicinity of the Airport, including through initial engagement with the Te Waka a Māui Iwi Chairs Forum and Iwi Environmental Managers on the runway extension, zoning, proposed aircraft noise contours and the noise mitigation.

Hapu and Iwi for both the local and wider context include Ngāti Rārua, Ngāti Toa Rangatira, Te Ātiawa o Te Waka-a-Māui, Ngāti Apa ki te Rā Tō, Rangitāne o Wairau, Ngāti Kuia, Ngāti Kōata and Ngāti Tama ki Te Tau Ihu.

As Ngāti Rārua have Statutory Acknowledgement and Deed of Recognition over the CMA, the relevant provisions of the Nga Taonga tuku iho ki Whakatu Management Plan have been considered and are as follows:

Key objectives relating to urban planning and land management

- *The mauri of nga whenua is healthy and able to support nga tangata, indigenous flora and fauna.*
- *Nga whenua provides sustenance for present and future generations.*
- *Waahi tapu are protected from the adverse effects of land use.*

Key objectives relating to Tane Mahuta

- *Indigenous flora and fauna exist in healthy populations across a range of habitats.*
- *The wairua and mauri of the uri of Tane Mahuta is protected.*
- *Tangata whenua customs and traditions associated with indigenous flora and fauna are sustained for present and future generations.*
- *The mauri and wairua of Tane Mahuta is recognised in customary practice.*

Key objectives relating to Tangaroa

- *Waterbodies are healthy and maintained to a level sufficient to:*
 - *Preserve the mauri of the waterbody.*
 - *Provide for tangata whenua cultural and spiritual values and customs and traditions.*
 - *Provide sustenance for present and future generations; and*
 - *Increase opportunities for tangata whenua to practice customs and traditions associated with the uri of Tangaroa.*

Key objectives relating to Rongo and Haumie

- *Mahinga kai populations and associated habitats are healthy and able to provide sustenance to tangata whenua*
- *Tangata whenua have access to culturally important mahinga kai.*

Based on historical data and aerial imagery as set out in the Report on Archaeology and Historic Heritage (**Attachment G1**) there has been substantial reclamation and reformation associated with the existing operative Designation DAA1.

For the proposal which would extend Designation DAA1 over the Nelson Golf Club land, whilst that area has been the subject of some disturbance it has not been levelled to the same extent. Accordingly, there remains some (low) probability of archaeological sites being found in that area, including but not limited to midden, ovens, cultural layers, stone and bone tool manufacturing floors and isolated artefacts. Without mitigation any effects on those sites would be negative, likely significant (depending on whether or not the site has been previously disturbed), and permanent.

10.9.1 Management

The Proposed Conditions incorporate, as part of the Archaeology and Heritage Management Plan, a requirement to develop accidental discovery protocols to govern the site development works.

A number of Proposed Conditions for other disciplines also overlap and provide for those values also identified as relevant within the Nga Taonga tuku iho ki Whakatū Management Plan, these include:

- ~ In terms of *Tane Mahuta* – Assessment as to the values associated with Maire Stream tributary and the effects management hierarchy in terms of indigenous flora and fauna, noting that this will be addressed primarily through detailed design and regional consents.
- ~ For Tangaroa – The importance associated with Maire Stream tributary, including effects associated with changes to freshwater habitats within an inanga spawning zone, and application of the effects management hierarchy and the careful management of stormwater, including through construction activities, noting that this will be addressed primarily through detailed design and regional consents.
- ~ In terms of Rongomatane and Haumie-tiketike, the Proposed Conditions of the NoR seek to manage and resolve effects which may impact on mahinga kai, noting that this will be addressed primarily through detailed design and regional consents.

In addition, the Proposed Conditions also seek to embed and facilitate engagement between iwi and the Airport Operator to provide members of a Kaitiaki Forum with updates, and opportunities for feedback, on the development of the northern runway extension.

10.9.2 Conclusion

As noted, only iwi can appropriately identify and attribute values important to mana whenua as associated with the Proposal and identify appropriate mitigation if required. NAL will continue to engage and be led by iwi in this regard.

10.10 Effects associated with a range of activities within the Airport Zone

10.10.1 Competitiveness

Airports have evolved over the last 20 years, since the NRMP was made operative in 2004, and the pressures on airports to change and compete are increasing. The region is in competition with other regions for residents, investment and visitors, and air travel is in competition with other travel modes for access and connectivity.

Airport businesses contribute to meeting the changing needs and expectations of travellers by making air travel efficient, enjoyable and hassle-free. Examples can be seen where airports provide sufficient capacity in terminal precincts, car parks and access roads to avoid wasteful congestion and delays, and provide food, beverage and retail outlets to meet the needs of travellers – the new contemporary terminal is an example of this.

In Nelson Airport's case, industrial (and commercial) development can help anchor services which rely both on passengers and freight¹⁰⁹.

10.10.2 Diverse Activities

The primary role of the Airport is planning for, providing, and maintaining necessary infrastructure for aviation operations to efficiently move passengers, freight and aircraft. This extends to the role of Nelson Airport in terms of providing both engine testing and Compass Swing facilities.

In addition to providing aeronautical facilities and services, a fundamental element of a modern aerodrome is also to provide and enable a range of diverse activities including food and beverage, retail, car hire, car parking and ground transport (taxis, Uber and coaches).

Other activities that can usefully co-locate at airports include:

- a. Hotels and motels.
- b. Recreation facilities for transit passengers.
- c. Air (and road network) freight forwarders and consolidators (logistics).
- d. Aviation maintenance and parts providers.
- e. Logistics, warehousing and distribution.
- f. Tourism and travel training institutions.
- g. Production, storage and logistics of time sensitive goods.
- h. Offices ancillary to the above.
- i. Show rooms for products that appeal to people with a high propensity to travel.
- j. Convenience retail and commercial services to aviation employees or secondary businesses (such as cafes, bars, gyms, banking, medical and childcare).

Visitor spending, as facilitated through aviation, is significant to the local economy. Airports are in a unique position to assist in-bound tourism through encouraging airline route development and network connectivity, as well as being the gateway to a region.

¹⁰⁹ The major freight user is King Salmon – average volume 25 tonne/week.

The movement by air of freight (and air side logistics) is a crucial component in the value chain of production and trade, underpinning the export arm of an economy, and generating jobs.

Airports (worldwide) have moved beyond the role of just being a facilitator of travel and trade (that is, planes simply landing and taking off), to becoming economic drivers and nodes in their own right, and increasingly becoming major nodes of employment.

10.10.3 Balancing the role of Nelson Airport in terms of Nelson's sustainable management

Whilst NAL clearly has a strong driver to enable a range of activities within the Airport Zone, NCC would not be performing its duties and functions under the RMA to promote sustainable management by providing for activities at the Airport which are not related to aviation if these would directly conflict with strategic aims to be realised for the city and wider region. Equally however, the NRMP should not unduly restrain the airport operations or undermine its role as a strategic resource.

The PPC seeks to provide the range of activities that would otherwise fall outside Designation DAA1 for 'Airport and Aerodrome Purposes', and therefore would be reliant on the plan provisions to be contained within the Airport Zone as to appropriate standards and thresholds to ensure compatibility with wider strategic urban growth and form aims. These include limitations to appropriately consider the broader economic context in which Nelson Airport sits outside Nelson's commercial centres hierarchy and the importance of economic activity within the CBD.

In this light, consideration of the provision, role and thresholds associated with office, retail and industrial activities (as defined in the NRMP) are considered below.

In terms of office activities, there may be a range of office activities that are attracted to the Airport Zone based on a competitive business location, and which may not otherwise locate in Nelson or the CBD. AIRPz.25 provides for Ancillary office activities to airport operations or permitted activities. Otherwise such activities are discretionary activities.

In terms of **retail activities**, there is a need to provide commercial and retail growth and opportunities at Nelson Airport where this is compatible with or benefits from locating at the Airport. This is based on the overall principle above, that allowing a wider diversity of activities at the Airport provides for its reliance and competitive positioning. Accordingly:

- a. it is not considered appropriate or necessary to limit retail activity (or hospitality) inside the terminal buildings as this provides a specific function for travellers/visitors (refer AIRPz.26(a));
- b. food and beverage in non-terminal areas would not result in material distributional effects, and would also provide opportunities for Airport Zone employees, 'meeters and greeters', and those employed in the adjoining Quarantine Road Industrial zone. A comparable 100m² on GFA (Gross Floor Area) is proposed (refer AIRPz.26(b)); and
- c. trade suppliers (a category which also includes other suppliers like automotive accessory stores and building supply outlets) do not need to be limited in the Airport Zone as the establishment of such activities would not result in business distribution impacts to the Nelson CBD, as these activities align more appropriately with the surrounding industrial environment (refer AIRPz.26(b)).

Otherwise, such retail activities are Discretionary activities in the proposed Airport Zone.

In terms of **Industrial activities** which also extends to manufacturing and distribution (logistics, freight) there is no resource management-based reason why such activities could not establish at the Airport Zone as permitted activities.

11 Assessment of relevant planning provisions and documents

11.1 Introduction

This section of the Report sets out the relevant planning hierarchy for consideration for both the NoR and PPC.

This assessment is made with reference to the preceding sections of the report, including:

- ~ Section 6 Assessment of Alternatives; and
- ~ Section 7 Assessment of Effects on the Environment.

The relevant provisions of the relevant National Policy Statements, National Planning Standards, the Nelson Regional Policy Statement and NRMP are included in full in **Attachment S**.

The assessment of the planning provisions and documents relevant to the NoR is particularly guided by the requirements of section 171(1) RMA and generally follows the hierarchy of applicable planning documents set out under section 171(1) RMA, being:

- Relevant National Policy Statements;
- The New Zealand Coastal Policy Statement (**NZCPS**);
- The relevant Regional Policy Statement.

For the PPC, an assessment of the relevant planning provisions and documents is set out in sections 66, 67, 74 and 75 RMA, being:

- Relevant national policy statements;
- The NZCPS;
- National planning standards;
- The relevant regional policy statement;
- Any relevant management plans and strategies prepared under other Acts.

11.2 National Policy Statements

11.2.1 National Policy Statement on Urban Development

Relevant Provisions: Objective 1, Objective 4, Objective 6, and Objective 8, Policy 1, and Policy 6

At a broad level, the NPSUD directs that local authority decisions on urban development are integrated with infrastructure planning decisions¹¹⁰, and that planning decisions contribute to well-functioning urban environments¹¹¹.

¹¹⁰ Objective 6.

¹¹¹ Policy 1.

NCC, Tasman District Council constitutes a Tier 2 Urban Environment¹¹².

Nationally significant infrastructure is defined in section 1.4 of the NPSUD, as inclusive of:

- (h) any airport (but not its ancillary commercial activities) used for regular air transport services by aeroplanes capable of carrying more than 30 passengers.*

This definition captures Nelson Airport.

The safe and efficient operation of infrastructure is consequently identified in Clause 3.32(c) as a qualifying matter for the application and intensification of residential development subject to Policy 3 / Policy 4.

The Objectives in the NPSUD that are relevant to this NoR and PPC are:

- ~ **Objective 1** - New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.
- ~ **Objective 4** – New Zealand’s urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations;
- ~ **Objective 6** - Local authority decisions on urban development that affect urban environments are:
 - o Integrated with infrastructure planning and funding decisions; and
 - o Strategic over the medium and long term; and
 - o Responsive, particularly in relation to proposals that would supply significant development capacity
- ~ **Objective 8** – New Zealand's urban environments:
 - o Support reductions in greenhouse gas emissions; and
 - o Are resilient to the current and future effects of climate change.

The NPSUD Policies that implement these Objectives direct that:

- ~ **Policy 1** - Planning decisions contribute to well-functioning urban environments, which includes supporting reductions in greenhouse gas emissions (e) and are resilient to likely current and future effects of climate change (f).
- ~ **Policy 6** - Planning decisions have regard to the planned urban built form of an area anticipated by RMA planning documents, which may involve significant changes to an area and its amenity values and may contribute to development capacity.

In terms of contribution to the outcome of a well-functioning urban environment, the NoR and PPC seeks to provide for safer, more resilient, more efficient use of Nelson Airport as nationally and regionally significant infrastructure. Nelson Airport also plays an important role in the socio-economic wellbeing of communities through its role in the tourism and trade sectors. By ensuring the ongoing operation and future development of Nelson Airport through the NoR and PPC, the wellbeing of our communities will be provided for now and into the future.

In terms of urban development and future urban form, the Aircraft noise contours and associated provisions that apply within them are important to provide for the strategic

¹¹² Table 2.

protection of Nelson Airport; and enables the surrounding community to be integrated with infrastructure development in a manner that provides for community wellbeing and manages reverse sensitivity effects.

One of the core objectives of the NoR is to facilitate a broader mix in aircraft, inclusive of new energy sources, aircraft, and powertrain developments to achieve sustainable aviation goals, which are best provided for through an extended runway¹¹³. Accordingly, the NoR and PPC (apart from embedded carbon associated with pavement) seeks to facilitate a reduction in greenhouse gas emissions in the long term.

For the reasons set out above, allowing the NoR and PPC contributes to a well-functioning urban environment and is consistent with, and achieves the outcomes sought by the provisions of the NPSUD.

11.2.2 National Policy Statement for Freshwater Management

Relevant Provisions: Objective 1, Policy 1, Policy 5, Policy 6, Policy 9

The NPS-FM came into force 3 September 2020 and was amended in December 2022. The NPS sets out an objective and associated supporting policies for freshwater management under the RMA.

The Objective of the NPS-FM is to ensure that natural and physical resources are managed in a way that prioritises:

- (a) first, the health and well-being of water bodies and freshwater ecosystems;
- (b) second, the health needs of people (such as drinking water); and
- (c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.

The relevant Policies that implement these Objectives direct that:

- ~ **Policy 1** – Freshwater is managed in a way that gives effect to Te Mana o te Wai.
- ~ **Policy 5** - Freshwater is managed (including through a National Objectives Framework) to ensure that the health and well-being of degraded water bodies and freshwater ecosystems is improved, and the health and well-being of all other water bodies and freshwater ecosystems is maintained and (if communities choose) improved.
- ~ **Policy 6** - There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted.
- ~ **Policy 9** - The habitats of indigenous freshwater species are protected.

With the exception of the edges with Jenkins Creek, and the with Maire Stream tributary, the Airport is centrally located within an urban environment, and well setback from waterbodies, with all appropriate infrastructure supported by appropriate discharge consents, including RM095045 as consented in April 2009 and with an expiry date of 8 April 2044. The scope of that consent:

“This application is for a ‘blanket’ stormwater discharge consent. This is a retrospective application by Nelson Airport Limited (NAL), to lawfully establish the stormwater discharges from the Nelson Airport. These discharges have been ongoing since the establishment of the

¹¹³ Attachment M. Airbiz [3(ii)].

airport in 1935, and upgrades in the early 1940s. The extent of the application site is shown in Appendix B...”

In terms of the Maire Stream tributary, and the saltmarsh vegetation which is identified in the Ecological Assessment¹¹⁴ as a wetland, the potential loss / effects on these waterbodies would need to be considered in the context of the requirements of the NES-F¹¹⁵, and NPS-FM when subsequent resource consents are lodged to facilitate works under NoR.

In terms of the relevant provisions of the NPS-FM [**Attachment S**], the loss of river extent and values should be avoided, where practicable (Policy 7 of the NPS-FM and for natural inland wetlands (Policy 6), unless NCC is satisfied that there is a functional need for the activity in that location; the effects of the activity are managed in accordance with the effects management hierarchy; and for wetlands that the loss arises as associated with the maintenance or operation of specified infrastructure (as inclusive of Nelson Airport) (as outlined in sections 3.2.2 and 3.24 of the NPS-FM). Further, habitats of indigenous freshwater species should be protected according to Policy 9 of the NPS-FM.

The effects management hierarchy will be considered at the time of application for regional consents. Therefore, the provisions discussed above should not form impediments to achieving the provisions of the NPS-FM and the NoR Objectives at the NoR and PPC stage.

11.2.3 New Zealand Coastal Policy Statement

Relevant Provisions: Objective 1, Objective 2, Objective 5, Objective 6, Policy 1, Policy 11, Policy 13, Policy 15

The NZCPS came into force in 2010.

The NoR does not seek to provide for any reclamation or works within the CMA.

For the purposes of Policy 1 ‘extent and characteristics of the coastal environment’, within the NRMP:

- The extension of Designation DAA1 to include part of the Nelson Golf Course is incorporated within the Coastal Overlay and Landscape Overlay (NRMP APP9.10 which identifies the significance of this coastal environment in terms of landscape);
- Appendix 25 (which identifies the extent of the boundary of the CMA) does not extend the CMA Boundary to that part of Maire Stream tributary within Designation DAA1. The existing extent of Jenkins Creek (Jenkins Stream within APP25) is contained within the operative Designation DAA1 and so is not relevant to the assessment of this NoR.

The Objectives in the NZCPS that are relevant to this NoR and PPC are summarised below and included in full at **Attachment Q**:

- ~ **Objective 1** - To safeguard the integrity, form, functioning and resilience of the coastal environment and sustain its ecosystems, including marine and intertidal areas, estuaries, dunes and land.
- ~ **Objective 2** - To preserve the natural character of the coastal environment and protect natural features and landscape values;
- ~ **Objective 5** - To ensure that coastal hazard risks taking account of climate change;

¹¹⁴ **Attachment H1.** Boffa Miskell [Section 6].

¹¹⁵ **Attachment H2.** Boffa Miskell [pg 5].

- ~ **Objective 6** - To enable people and communities to provide for their social, economic, and cultural wellbeing and their health and safety, through subdivision, use, and development, recognising that:
 - the protection of the values of the coastal environment does not preclude use and development in appropriate places and forms, and within appropriate limits;
 - some uses and developments which depend upon the use of natural and physical resources in the coastal environment are important to the social, economic and cultural wellbeing of people and communities; and
 - historic heritage in the coastal environment is extensive but not fully known, and vulnerable to loss or damage from inappropriate subdivision, use, and development.

Relevant policies are summarised below and included in full at **Attachment Q** and provide:

- ~ **Policy 1** - To recognise the extent and characteristics of the coastal environment (as these values are incorporated in the subsequent planning framework).
- ~ **Policy 11** - To protect indigenous biological diversity in the coastal environment.
- ~ **Policy 13** - Preserve natural character of the coastal environment from inappropriate subdivision, use and development.
- ~ **Policy 15** - Protect natural features and natural landscapes, including avoiding adverse effects on outstanding natural features and outstanding natural landscapes in the coastal environment.

Policy 11(a)(i) requires the avoidance of adverse effects of activities on indigenous taxa that are listed as *Threatened* or *At Risk* in the New Zealand Threat Classification System lists. The analysis by Boffa Miskell¹¹⁶ has determined there whilst there are a number of such avifauna species in the area, the Designation (and subsequent works) will not give rise to significant adverse effects on Threatened or At Risk species in the area due to:

- ~ The footprint being contained within the existing golf course which provides habitat of low value for avifauna.
- ~ The likely lack of breeding habitat for Threatened or At-Risk species within and immediately adjacent to the footprint.
- ~ The existing high level of disturbance to birds in the estuarine and coastal areas to the north associated with active recreational and off-lead dog areas.
- ~ The existing levels of artificial lighting in the area

In terms of remaining considerations for Policy 11, there will not be any significant effects on marine habitats¹¹⁷.

In terms of effects associated with natural character and landscape, the analysis from Boffa Miskell has determined that the site subject to the NoR does not constitute an area of outstanding natural character¹¹⁸ (Policy 15(a)), nor an area of outstanding natural character in the coastal environment (Policy 13(1)(a)). In terms of Policies 13(1) and 15(b) which applies to

¹¹⁶ **Attachment H1.** Boffa Miskell [Section 5.3.1.4], **Attachment H2.** Boffa Miskell [pg 6].

¹¹⁷ **Attachment H2.** Boffa Miskell [pg 5].

¹¹⁸ **Attachment J2.** Boffa Miskell [5.1].

other natural features and natural landscapes in the coastal environment and requires the avoidance of significant adverse effects and the avoidance, remedying or mitigation of other adverse effects, Boffa Miskell consider that the NoR is considered consistent with the existing level of modifications ensuring it could be absorbed into the relatively modified terrestrial coastal environment accommodating the existing golf course¹¹⁹. The exception being natural character values associated with Maire Stream tributary, where despite its attributes only being considered as providing ‘moderate-low’ contributions to natural character¹²⁰, consideration should be given to any subsequent works through realignment and enhancement through creating a more natural stream shape further supplemented with indigenous vegetation.

In terms of accounting for coastal hazard risk (Objective 5) these have been considered by Stantec, who has concluded that these do not present a material risk to the Proposal, noting that the proposed northern runway extension is well set back from predicted shoreline erosion and does not encroach the existing coastline¹²¹.

Lastly, (Objective 6(h)), the analysis from Underground Overground identifies that there is a low potential for pre-1900 archaeological sites to be present within the northern runway extension are¹²², and it is likely that any sites that do remain are likely to be in a disturbed state. However, Conditions are provided in the NoR in terms of Archaeological management during subsequent works, and an Accidental Discovery Protocol as part of the proposed Archaeological and Heritage Management Plan.

11.2.4 National Planning Standards (2019)

Relevant Provisions: Part 8 Zone Framework, Table 13

The National Planning Standards (2019), Part 8 Zone Framework Standard sets out the following requirements in terms of application of Zones from the Template. Table 13 of the National Planning Standards identifies application of a specific Airport Zone as being relevant for an area used predominantly for the operation and development of airports and other aerodromes:

Zone	Description
Airport Zone	<i>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.</i>

For the NRMP, which is a combined plan, there is a mandatory direction to apply the zones in Table 13¹²³. Special Purpose Zones, which include the Airport Zone, are to be applied subject to clause 3 and subject to the following criteria¹²⁴:

“An additional special purpose zone must only be created when the proposed land use activities or anticipated outcomes of the additional zone meet all of the following criteria:

¹¹⁹ **Attachment J2.** Boffa Miskell [6.1].

¹²⁰ **Attachment J2.** Boffa Miskell [4.6].

¹²¹ **Attachment I1.** Stantec [5].

¹²² **Attachment G1.** Underground Overground [10.1.1].

¹²³ National Planning Standards (2019). Section 8(1).

¹²⁴ National Planning Standards (2019). Section 8(1)(3).

- a. are significant to the district, region or country*
- b. are impractical to be managed through another zone*
- c. are impractical to be managed through a combination of spatial layers”.*

In terms of these criteria, Nelson Airport is significant to the district, region and country (clause 3(a)); is impractical to be managed through another zone, as the existing Open Space and Recreation and Industrial zones do not appropriately recognise and provide for contemporary commercial aviation and associated activities (Clause 3(b)), and the activities are impractical to manage through spatial layers such as overlays over the underlying open space and Industrial zones (clause 3(c)).

The proposal to create a specific Airport Zone in the PPC is therefore consistent with the direction in the National Planning Standards described above.

11.3 Nelson Regional Policy Statement

Relevant Provisions: DH2 – Natural Hazards, NA1 – Amenity Values, NA2 – Landscape Values and Natural Features, NA3 – Protection of Significant Indigenous Vegetation and Significant Habitats of Indigenous Fauna, NA5 – Management of Riparian and Coastal Margins, IN4 – Air Transport.

The Nelson Regional Policy Statement (RPS) was made operative in March 1997.

The nature and extent of the RPS reflects its inception as a first generation RMA Regional Policy Statement, accordingly, the provisions are broad and largely reflect Part 2 of the Act in terms of specific values.

Within the RPS the Airport is identified as a major transport facility (IN2), whose existence is sensitive to urban land use (Policy DH1.3.3(vi)).

The relevant objectives and policies seek:

- ~ **Objective IN4.2.1 and Policy IN4.3.2:** To meet the air transport needs of Nelson City and surrounding areas, whilst managing adverse effects on amenity values and the environment, recognising the importance of air transport to present and future wellbeing.
- ~ **Policy IN4.3.3:** Where expansion of air transport infrastructure is considered to have greater net benefit than intensification of the use of existing air transport infrastructure, to provide for the most appropriate form of expansion, assessing the costs and benefits of options.
- ~ **Policy IN4.3.4:** To minimise the adverse effects of airport-related noise on adjoining sensitive uses by physical separation between the airport and such uses, and through limiting airport generated noise.
- ~ **Objective DH2.2.2:** That adverse effects from hazard events being minimised.
- ~ **Objective NA1.2.1 and Policy NA1.3.3:** To preserve or enhance amenity and conservation values, avoiding as far as possible or otherwise remedy or mitigate conflicts between adjoining land uses.

- ~ **Objective NA2.2.1:** A landscape which preserves and enhances the character of the natural setting and in which significant natural features are protected.
- ~ **Objective NA3.2.1:** Protection of areas of significant indigenous flora and significant habitats of indigenous fauna.
- ~ **Policy NA1.3.3:** To avoid and as far as possible remedy or mitigate conflicts between adjoining land uses.
- ~ **Objective NA5.2.1:** Management of riparian and coastal margins which protects and enhances significant habitats, natural features, natural functions, natural character, landscape, amenity, cultural features and water quality.

In terms of natural hazards, landscape values and indigenous vegetation and habitats, these matters are addressed in terms of a consideration of relevant National Policy Statements above. There are no material effects or activities that result in a tension with these provisions, with the central matter being to ensure that the effects management hierarchy is applied to works associated with Maire Stream tributary to ensure that effects on natural character and indigenous habitat and fauna are appropriately addressed. As identified, these works when sought to be enabled by any subsequent Outline Plan for the northern runway extension will need to be accompanied with assessments and applications for regional consents pursuant to regional rules in the NRMP and also the NES-F.

Objective IN4 recognises that the air transport needs of the Region as provided by Nelson Airport are to be met, whilst managing adverse effects. This is primarily undertaken through the Proposed Conditions on the NoR, including monitored noise levels at the ANB, restrictions on aircraft flight times (during night time hours), and also preparation of a Noise Monitoring and Management Plan. Such an approach achieves this Objective, and also **Policy IN4.3.4** which seeks to minimise adverse effects on adjoining sensitive receivers. The proposal furthers the attainment of **Policy IN4.3.2** which seeks to recognise the importance of air transport to the present and future wellbeing of the wider Nelson-Tasman community.

Policy IN4.3.3 explicitly recognises and provides for the expansion of air transport infrastructure, but that such expansion is to provide a greater net benefit than intensification. The drivers for the NoR and PPC are identified in the analysis from Airbiz [**Attachment M**], identifying that the extended runway configuration provided by the NoR is reasonably necessary such that:

“Nelson Airport can continue to provide for current and future aircraft types as well as improve safety related infrastructure. They also ensure that future Airport operations are not unduly constrained by development or intensification occurring around the Airport”.

In addition, this policy requires an assessment of the costs and benefits of feasible options – this is carefully considered in the MCA in Section 5 of this Report, as predicated on considerable analysis by a number of experts on relevant matters such as acoustics, ecology and landscape. The altered Designation DAA1 represents the better, or most appropriate expansion of air transport infrastructure in terms of a consideration of these effects¹²⁵.

Policy IN4.3.4, **Objective NA1.2.1** and **Policy NA1.3.3** relate to amenity (as defined in section 3 of the Act), with the former focusing on managing the noise environment to maintain community health and welfare.

¹²⁵ S171(1).

Designation DAA2 retains the operative requirements on Nelson Airport to monitor and manage compliance with the ANB. Through the NoR, there are also additional requirements as to monitoring aircraft noise, the preparation of a Noise Monitoring and Management Plan as well as a Noise Monitoring Report, and requirements on Nelson Airport to provide insulation and / or ventilation to existing affected residential units when aircraft noise reaches certain levels – as associated with the AANC. Designations DAA1 and DAA2 work in tandem to provide certainty to the community that aircraft noise will be appropriately managed and monitored in a way that provides for community wellbeing.

In addition, within the associated controls on engine testing at the Airport being retained through the PPC, and additional provisions inserted relating to the management and control of Compass Swings which were not subject to express noise limits within NRMP, but facilitated through Designation DAA1. A consistent suite of insulation / ventilation requirements and restrictions on the establishment (and increased intensity) of ASAN is applied to all corresponding zones that currently, or may in future, be located within the AECO and ANB. The approach represents the application of NZS6803:1992 with regard to the management approach for aircraft noise.

Relating to wider landscape amenity and landscape and character values (**Objective NA2.2.1** and associated policies), Boffa Miskell has identified that whilst existing recreational opportunities will need to be adapted to a runway extension, the ‘open space’ of a grassed airfield (RESA area) is likely to provide a similar amenity that is currently available to nearby residents with reduced recreational open space. Based on the above, it is considered the proposal will have an overall low-moderate (adverse) effect on the physical landscape and existing landscape character¹²⁶, for proximate residential properties visual effects will range from low (adverse) to high (adverse)¹²⁷, but are able to be managed through the Proposed Conditions on the NoR including the requirement for a Landscape and Design Plan to be prepared¹²⁸.

Stantec has identified, in relation **Objective DH2.2.2** that the proposed NoR creates no effects on coastal risk or coastal processes, and that effects associated with Geotech and Flood hazard can be managed through detailed design and subsequent regional consenting pathways¹²⁹.

In summary, the NoR is consistent with the RPS for the purposes of s171(1)(a)(iii), and the associated PPC gives effect to these provisions.

11.4 Nelson Resource Management Plan

Relevant Provisions:

District Wide Objectives and Policies

Tangata Whenua – DO1

Natural Hazards – DO3

Heritage – DO4

Natural Values – DO5

¹²⁶ Attachment J2. Boffa Miskell [6.2.2].

¹²⁷ Attachment J2. Boffa Miskell [6.3.2].

¹²⁸ Attachment J2. Boffa Miskell [7].

¹²⁹ Attachment I2. Stantec [pg 2].

Riparian and Coastal Strips – DO6

Coastal Environment – DO7

Air Transport – DO11

Zones – DO6

The most relevant provisions in terms of the NRMP are contained in Chapter 5 – District Wide Objectives and Policies.

The Airport activities and operations are currently contained within the Chapter 11 – Industrial Zone provisions, however these are of little relevance to the broader consideration of the NoR in terms of s171(1)(iv) of the Act, especially as this request also incorporates a PPC to establish a standalone Airport Zone. The operative Industrial Zone provisions addressed such matters as the role of the zone (Objective IN1), limitations on inappropriate activities (Policies IN.1.1, IN1.2, and IN1.4) and Amenity (Objective IN2) – these values have been included in the proposed Airport Zone.

Accordingly, the focus of this consideration is:

- ~ The effects on the environment of allowing the NoR having particular regard to the relevant NRMP provisions (s171(1)(iv) RMA); and
- ~ Whether the provisions as amended (**Attachment T – Amended Plan Provisions**) implements¹³⁰, and is the more appropriate way to achieve the objectives – considering their efficiency and effectiveness.¹³¹

Nelson Airport is recognised as an important community resource (**Policy DO11.1.1**) and that its long-term continuation at its present location is to be provided for (**Objective DO11.1**), subject to managing the effects of noise to reasonable levels (**Policy DO11.1.2**)¹³² to ensure a reasonable balance between the operational needs of the Airport over time and the amenities and wellbeing of the community (**Policy DO11.1.3**).

The NoR and PPC seek to enable the ongoing operation and future development of Nelson Airport to be achieved in its present location. NAL (as a responsible Airport Operator) has also updated its projected noise modelling of aircraft operations through to 2050. This provides certainty to the Airport Operator and the wider community as to the long term future configuration and operation of the Airport, and enables surrounding land use to be appropriately developed and integrated within that environment.

These effects are outlined in the effects assessment in Section 10.4.10 which conclude that at a wider community level anticipated noise effects as associated with the NoR will be similar in nature, scale and extent to those anticipated under the existing environment (under the operative NRMP provisions). Although it is acknowledged that for proximate residents, adverse effects will be more material, but managed through the dual NoR and PPC insulation and ventilation requirements on both the Airport Operator, and existing residential units that are being replaced or substantially altered by developers.

Through the Proposed Conditions for the NoR, the Airport Operator will manage compliance at the ANB, monitor and provide a NMMP, and offer (through the AMP) the insulation and / or

¹³⁰ S75(1).

¹³¹ S32(1).

¹³² As modelled under the Operative Plan out to 2020. (Policy DO11.1.2).

ventilation of existing lawfully established residential units within the Residential Zone and the ANB and AECO as monitored noise levels increase.

In addition, through the PPC, an appropriate effects management framework is provided in the NRMP with regard to engine testing, and the insertion of specific thresholds and controls for Compass Swings in the Airport Zone Plan provisions. Under that regime, the effects on proximate residents have been assessed as reasonable¹³³.

In summary the approach is considered consistent with these provisions, for the purposes of s171(1)(a) RMA, and the proposed PPC provisions achieve and implement Objective DO11.1. Further changes are also recommended in the PPC to ensure that the Airport is recognised and provided for as nationally and regionally significant infrastructure, including in Chapter 5 District Wide provisions.

In relation to matters associated with **Natural Hazards**¹³⁴ (Objective DO2.1 and associated policies), as identified by Stantec, the NoR and amendments to Airport Zone achieves these provisions. The proposed NoR creates no effects on coastal risk or coastal processes, and that effects associated with Geotech and Flood hazard can be managed through detailed design and subsequent regional consenting pathways.¹³⁵

In terms of Heritage values, the existing listed heritage building in the NRMP is not amended by this proposal, nor does the NoR extend into any area otherwise identified for its Heritage Values in the NRMP. The PPC does seek to delete from the Planning Maps notations associated with Hangar 1 and Hangar 3 which have been deconstructed and no longer appear on the Schedule in Appendix 1 'Heritage Buildings, Places and Objects'. As identified¹³⁶ in **Attachment G2**, Proposed Conditions are proposed through the NoR to address archaeological management during works for the northern runway extension. An Accidental Discovery Protocol is also proposed through the Archaeology and Heritage Management Plan.

Relating to Landscape values (Objective DO9.1 and associated policies), Coastal Environment (Objective DO7.1 and associated policies) and Riparian Margins (Objective DO6.1 and associated policy DO6.1.4), Boffa Miskell¹³⁷ has determined that there are no Section 6(a) or (b) RMA values that will be adversely affected by the proposed extension. Natural character and landscape values associated with Maire Stream tributary can be appropriately considered and responded to, as associated with regional consenting processes. Whilst there will be implications on immediately proximate views these can also be managed through a proposed Landscape and Design Plan, and through the subsequent outline plan process.

In this regard Boffa Miskell¹³⁸ also considered the current Open Space and Recreation Zone as occupied by the Nelson Golf Club in terms of the NoR. In relation to Objective OS1 which seeks to maintain and enhance opportunities for the use of open space and recreation land, and Policy OS1.1 which seeks to recognise and protect the amenity provided by open space and recreation land, it is considered that the effects on these matters from the works enabled by the extended Designation DAA1 extent are appropriate in the context of the surrounding environs. That conclusion is largely on the basis that the proposed extent of modifications can be absorbed into the terrestrial landscape of the golf course which has been highly modified through

¹³³ **Attachment K2.** Marshall Day Acoustics [13].

¹³⁴ **Attachment I1.** Stantec.

¹³⁵ **Attachment I2.** Stantec [pg 2].

¹³⁶ **Attachment G2.** Underground Overground [pg 5].

¹³⁷ **Attachment J2.** Boffa Miskell [5.1].

¹³⁸ **Attachment J2.** Boffa Miskell [5.3.1].

landscape sculpting and exotic grasslands¹³⁹. It is acknowledged that the functional attributes of the Nelson Golf Club will be diminished by the runway as facilitated by the NoR, but that the Nelson Golf Club layout should be able to be reconfigured such that the open space attributes and recreational activity itself as undertaken on the balance area is not eliminated.

In relation to Natural values (Objective DO5.1, Policy DO5.1.1 and Policy DO6.1.4 as it relates to values associated with the margins of Maire Stream tributary), Boffa Miskell¹⁴⁰ consider that:

- ~ the proposed works would likely result in minor adverse effects on vegetation and habitats. This is due to the loss of 0.17 ha of indigenous dominated saltmarsh vegetation along Maire Stream tributary, with all other vegetation and terrestrial habitat being of negligible ecological value;
- ~ the effects on the Maire Tributary saltmarsh vegetation and the potential loss / effects on this may need to be considered in the context of the requirements of the NES-F;
- ~ effects on marine habitat through potential construction and operational effects on the would not pose significant ecological concerns and can be managed;
- ~ effects on Maire Stream tributary is to be managed in terms of the effects management hierarchy, in accordance with NPS-FM and NES-F requirements.

Lastly in terms of Māori values, this matter is addressed in 10.9. It is noted that only Iwi can appropriately identify and attribute values important to mana whenua as associated with the Proposal and identify where appropriate mitigation. This cultural input will be sought through continued engagement.

In summary, recognition of the important contribution made by Nelson Airport is recognised and provided for in the NRMP. However, the provisions – including the Designation and associated airnoise contours are outdated.

Nelson Airport seeks to maintain and develop its operational capacity and resilience to contribute to regional and national prosperity. The balance between the needs of aviation activities, community wellbeing, and urban form is well pronounced within the NRMP. The proposed NoR and PPC seek to provide certainty and management around those matters, including the reciprocal need for NAL to manage aircraft operational noise, and the desire to reduce annoyance and reverse sensitivity considerations – as achieved through limiting ASAN proximate to airport operations including through density controls, requiring noise insulation / ventilation for redevelopment, and providing a requirement on NAL to facilitate noise insulation and / ventilation for existing lawfully established residential units in residential zones as commensurate with increased noise effects.

The NoR and associated spatial extent of the Airport Zone encroaches into that area occupied by Nelson Golf Club. Whilst this area is not considered urban, the site is modified, and the wider landscape character is substantially influenced by the presence of aircraft and the associated visual effects of the Airport and associated infrastructure. There are limited natural resource values associated with the proposed runway extension area which largely relate to the Maire Stream tributary. However, the Proposed Conditions of the NoR, as well as the subsequent outline plan and regional consenting processes will appropriately account for and manage

¹³⁹ Attachment J2. Boffa Miskell [5.2].

¹⁴⁰ Attachment H2. Boffa Miskell [pg 3 - 6].

effects on those values. Neither the NoR, nor the PPC affect the life supporting capacity of air, water or soil ecosystems.

Overall, the NoR is considered to be consistent with these provisions for the purposes of s171(1)(a)(iv) RMA, and the associated PPC gives effect to these provisions.

11.5 National Adaption Plan

Section 74(2)(e) of the RMA requires in relation to changing a district plan regard should be had to:

‘any national adaption plan made in accordance with section 5ZS of the Climate Change Response Act 2002’.

Published in August 2022, the National Adaption Plan (2022) ‘Urutau, ka taurikura: Kia tū pakari a Aotearoa i ngā huringa āhuarangi - Adapt and thrive: Building a climate-resilient New Zealand – as New Zealand's first national adaptation plan’ provides Aotearoa New Zealand’s long-term strategy and first national adaptation plan. The long-term strategy sets out the Government’s approach to adaptation.

Relevant Provisions:

Chapter 8: Objective INF1, Objective INF2 and Objective INF3

The Objectives seek respectively to: reduce vulnerability of assets exposed to climate change; ensure that all new infrastructure is fit for a changing climate; and use renewal programmes to improve adaptive capacity.

The NoR represents design and investment in additional infrastructure to support and facilitate operations already being undertaken by infrastructure as represented by Nelson Airport.

In determining that it is necessary to upgrade the existing main runway at Nelson Airport, Nelson Airport has considered long-term climate impacts. The northern extension represents the more appropriate option in terms of risk management and vulnerability. The NoR has no effects on coastal risk, and adverse effects associated with flooding can be avoided, remedied or mitigated through detailed design and subsequent regional consenting pathways. Vulnerabilities in terms of flood risk for buildings and Finished Floor Levels (FFLs) can be further considered through detailed design, and be addressed at a later stage through the resource consent process¹⁴¹.

The upgraded infrastructure at Nelson Airport is fit for a changing climate.

¹⁴¹ Attachment I2. Stantec (pg 3)

11.6 Emissions Reduction Plan

Section 74(2)(d) of the RMA requires in relation to changing a district plan regard should be had to:

‘any emissions reduction plan made in accordance with section 5Z1 of the Climate Change Response Act 2002’.

Published in May 2022, the Emissions Reduction Plan (2022) ‘Te hau mārohi ki anamata Towards a productive, sustainable and inclusive economy – is New Zealand’s First Emissions Reduction Plan It contains strategies, policies and actions for achieving the first emissions budget, as required by the Climate Change Response Act 2002.

The long-term strategy sets out the Government’s approach to adaptation.

Relevant Provisions:

Chapter 10. Transport. Focus Area 3: Begin work now to decarbonise heavy transport and freight.

Chapter 11. Energy and Industry: Focus Area 3: Reduce our reliance on fossil fuels and support the switch to low emission fuels.

Chapter 12. Building and Construction

Objective 1: *Reduce embodied carbon of buildings.*

Focus Area 1: Reduce embodied carbon of construction materials.

Objective 2: *Reduce Operational Emissions*

Focus Area 4: Shift energy use from fossil fuels.

The relevant matters in Chapter 10 and Chapter 11 of the Emissions Reduction Plan seek to decarbonise freight in terms of transport and also reduce reliance on fossil fuels. Action 10.3.3 specifically seeks to commence work to decarbonise aviation. Chapter 12, Objective 2 also seeks to reduce operational emissions. A key driver of the NoR and extension to the runway is to enable NAL to accommodate next generation sustainably powered aircraft. **Attachment M** identifies that:¹⁴²

“a key focus of providing for future sustainable aircraft that are likely to be heavier than current types and require more runway length. To this end NAL has determined that the main runway should be extended to cater for such emerging aviation technology”.

The runway extension will directly contribute to achieving the objectives and implementing the actions of the Emissions Reduction Plan by enabling lower emission aircraft to be used for the movement of people and goods across New Zealand.

Chapter 12, Objective 1 seeks to reduce embodied carbon in building materials and design. While an extension to the existing main runway and associated pavement works will involve embedded carbon, this needs to be considered in the context of the objectives of the NoR

¹⁴² **Attachment M.** Airbiz [3.iii]

which include facilitating aviation connectivity through providing infrastructure to support future green energy aircraft types.

11.7 Rautaki Hanganga o Aotearoa New Zealand Infrastructure Strategy 2022-2052

Sections 66(2)(c)(i) and 74(2)(b)(i) of the RMA require consideration of management plans and strategies prepared under other Acts.

Te Waihanganga – New Zealand Infrastructure Commission has released the New Zealand Infrastructure Strategy (**Strategy**) 2022-2052, prepared under the New Zealand Infrastructure Commission / Te Waihanganga Act 2019. The vision for the Strategy is for infrastructure to lay a foundation for the people, places and businesses of New Zealand to thrive for generations. The Strategy is focused on five key objectives to achieve the vision, including building attractive and inclusive cities, strengthening resilience to shocks and stresses, moving to a circular economy, enabling net-zero emissions and supporting towns and regions to flourish.

Relevant to Airports, the Strategy notes the following:

- Infrastructure has a critical role in helping New Zealand to achieve net zero emissions by 2050. Clean electricity is identified as key for reducing emissions from transport, process heat, and agricultural activities, but streamlined regulatory processes are needed to enable the development of renewable energy projects. In this regard, the Strategy recommends that existing airport infrastructure should be prepared for zero emissions commercial electric flights.
- Infrastructure has an important role in connecting the primary production regions of New Zealand to larger centres and overseas markets. Fundamentally the Strategy highlights the need to improve the efficiency of the national supply chain (including airports, ports, roads and rail) to achieve an integrated, resilient and multimodal network.

The runway extension will directly contribute to achieving the objectives noted above to achieving the vision of the Strategy. The extension will enable lower emissions aircraft to be used for the movement of people and goods across New Zealand. The runway extension will also improve the resilience of Nelson Airport as a critical role in the national supply chain, including by connecting Nelson-Region to larger centres and overseas markets.

11.8 Section 74(2)(c) Consistency with the Tasman Resource Management Plan

Section 74(2)(c) requires in relation to changing a district plan a territorial authority shall have regard to District Council

‘the extent to which the district plan needs to be consistent with the plans or proposed plans of adjacent territorial authorities’.

The only matter that requires an integrated approach at the interface with the Tasman Resource Management Plan (**TRMP**) is the OLS. Under the operative Tasman Resource Management Plan, the OLS as associated with Nelson Airport is neither notated in the planning maps nor identified in the plan provisions. The proposed composite OLS as associated with NoR DAA3 expands over into the Tasman District, particularly over the Richmond and Rabbit Island areas but would be well in excess of the permitted, and even anticipated building heights for all zones.

Regardless, Tasman District Council has embarked on a process to replace the TRMP with the Tasman Environmental Plan (**TEP**). That Plan is to be notified well after this NoR and PPC are considered by NCC, and Nelson Airport will then submit on the TEP to ensure integration.

12 Consultation and notification

NAL has long signalled to the community and relevant stakeholders of the need for a longer runway through various public documents, including (most recently) its annual report and 2050 Airport Master Plan. In the context of this NoR and PPC, NAL has also undertaken consultation with the community and key stakeholders which is summarised below. Consultation with affected parties, relevant stakeholders and the community will be ongoing throughout the course of the NoR and PPC processes.

12.1 Central and Local Government consultation

Central and local government consultation and engagement on NAL's runway extension plans, (including its 2050 Airport Master Plan) has been ongoing since 2019. Parties briefed include the Mayor of Nelson, NCC executives and councillors, and Nelson and Tasman Members of Parliament.

12.2 Affected landowners and the community

In April 2022, a letter was sent to each of the identified landowners / occupants that would be affected by the changes to the proposed aircraft noise contours. The letter included a summary of the proposed runway extension (the reasons for the extension), and what the changes mean for these properties. Landowners were also invited to attend a community drop-in session held on 12 May 2022. A copy of the letter that was sent to landowners / occupiers is attached as **Attachment P1**.

In addition to the letter sent to affected landowners, the community drop-in session was more broadly publicised to the wider community through NAL's website and a media release. The media release was picked up both locally and nationally which increased awareness of the extension plans and the community drop-in session.

The community drop-in session was held at the Honest Lawyer, 1 Point Road, Monaco, Nelson in May 2022. The purpose of the session was to provide the opportunity for residents and community members to talk with NAL staff and subject matter experts about the runway extension plans. NAL developed a range of material to assist the community in understanding the basis for the runway extension and its implications, including:

- (a) presentations on the case for a runway extension;
- (b) handout documents summarising the proposed runway extension; and
- (c) posters outlining the background and context of the proposed runway extension (including information on the timelines, noise mitigation package available, and zoning).

Copies of these documents are attached as **Attachments P2-P4**.

In relation to the Nelson Golf Club whose landholdings are directly impacted by the proposed runway extension, NAL has undertaken engagement over many years (since the early 2000's).

As a result of the Nelson Plan review process being undertaken by NCC, engagement between NAL and the Nelson Golf Club on the proposed runway extension has been open and regular since mid-2021. NAL has supplied the Nelson Golf Club with a range of information to assist it to understand what is proposed and with the Club's future planning. Dialogue with the Nelson Golf Club remains active and constructive.

12.3 Mana whenua

Collective and individual engagement with mana whenua on this proposal has been on-going since April 2022.

On 21 April 2022, NAL submitted a consultation paper to the Te Waka a Māui Iwi Chairs Forum on the runway extension, zoning, proposed aircraft noise contours and the noise mitigation package. NAL also sought guidance from the Forum on how it prefers NAL conduct consultation with iwi to ensure that any consultation was fit for purpose and aligned with their approach.

On 28 April 2022, NAL sent an information pack on the runway extension and associated information to the Environmental Managers of Ngāti Apa ki te Rā Tō, Ngāti Koata, Ngāti Kuia, Ngāti Rārua, Ngāti Tama, Ngāti Toa Rangatirea, Ngāti Rangitāne, and Te Ātiawa, and on 13 June 2022, NAL met with the Iwi Chairs' Forum to discuss the consultation paper submitted in April and provide the various Iwi representatives with the opportunity to provide feedback.

On 1 February 2023, NAL attended a call with Te Ātiawa to discuss the proposal further, including whether there was any interest in developing a Cultural Impact Assessment.

NAL recognises that engagement with mana whenua requires a commitment to develop and maintain positive and enduring relationships. NAL is committed to providing mana whenua with opportunities to provide their input, not only for this process, but as a long-term endeavour as the Airport continues to develop into the future. Considering this commitment, consultation with mana whenua will be carried out on an ongoing basis throughout the NoR and PPC processes.

12.4 Other key stakeholders

NAL has also consulted (and is continuing to consult) with a range of key stakeholders on the runway extension and associated NoR and PPC, including those listed in the table below.

Key stakeholder	Nature of Consultation
Air New Zealand	Since 2019, NAL has engaged with Air New Zealand on a range of matters relating to its runway extension plans as relevant to Air New Zealand's operations, including:

Key stakeholder	Nature of Consultation
	<ul style="list-style-type: none"> Existing runway constraints Future fleet mix Runway extension implications for relief of existing constraints and protecting future aircraft requirements Activity forecasts Noise modelling and noise mitigation Compass Swing requirements <p>Recent engagements with Air New Zealand have resulted in the airline providing NAL with a letter of support of its runway extension plans.</p>
Airport Shareholders (Nelson City Council and Tasman District Council)	Regular updates on plans and processes at various shareholder forums.
Nelson Airport Noise Action Council ("NANAC")	In May 2022, NAL briefed the NANAC prior to its community drop-in session on the runway extension, zoning, proposed aircraft noise contours, and the noise mitigation package. Later that month, NANAC had a second briefing on its runway extension plans, where approximately 10 members attended. Through its membership of the Nelson Airport Noise Environment Advisory Committee, NANAC also receives updates.
Nelson Airport tenants (Nelson Aviation College, GCH Aviation, Air New Zealand, Hanger 2 Ltd, Helicopters Nelson Ltd, Nelson Aero Club, Originairs, Sounds Air, Airways Nelson)	Tenants were proactively contacted in April 2022, and all received copies of the information pack delivered to local residents in April 2022. In addition to the April 2022 contact, NAL tenants have received quarterly updates via the airport's electronic newsletter.
New Zealand Airports Association	In June 2022, New Zealand Airports Association was sent a copy of the information pack that was delivered to affected residents prior to the community drop-in session, and a teleconference discussion was held on the runway extension plans.
Port Nelson	In June 2022, Port Nelson was sent a copy of the information pack that was delivered to affected residents prior to the community drop-in session.

Key stakeholder	Nature of Consultation
Tāhunanui Campground Management (including permanent residents)	In April 2022, the Tāhunanui Campground was briefed verbally and sent a copy of the information pack that was delivered to affected residents prior to the community drop-in session.

12.5 Other consultation

NAL has a general mailbox (which is publicly advertised) and has received occasional email enquiries from the public regarding its runway extension plans. NAL reviewed and responded to all enquiries in a timely manner. NAL also received 15 feedback forms on its runway extension plans following the community drop-in session in May 2022, all of which have been responded to.

NAL has also set up a project website page to provide information on its runway extension plans for public reference. The website, Our Future,¹⁴³ went live on 28 April 2022. During the 2022 calendar year, there were a total of 1,258 page views. On 16 November 2022, NAL added an interactive map, which allows people to search for a property and see where it sits within both the current and proposed aircraft noise contours. The map also contains an explanation of what each of the aircraft noise contours mean for property owners within its boundary.

Additionally, the website contains a FAQ section on the runway extension project. Information provided through the website's FAQ section included:

- (a) why the Airport is extending its runway;
- (b) what is happening with the current Airport Effects Advisory and Control overlays;
- (c) what aircraft noise contours are and why they need to be updated as part of this process;
- (d) what NAL will do to reduce the impact of airport noise on the surrounding community;
- (e) what is a RESA and why it is required if the runway is extended;
- (f) how the Airport monitors noise and whether any changes are being made to engine testing restrictions or other noise restrictions on the Airport; and
- (g) information regarding submissions.

NAL has also created and installed informational material on its runway extension plans in the public areas of the terminal building.

¹⁴³ <https://www.nelsonairport.co.nz/ourfuture>.

13 NoR Assessment

When considering a NoR (for an alteration to a designation) and its effects on the environment, NCC must have particular regard to the following matters:

- Relevant provisions of a proposed national policy statement, coastal policy statement, regional policy statement or proposed plan;
- Whether adequate consideration has been given to alternative sites, routes or methods of undertaking the work if the requiring authority (NAL) does not have an interest in the land required for the work;
- Whether the work and designation are reasonably necessary for achieving the objectives of NAL;
- Any other matter NCC considers reasonably necessary in order to make a recommendation; and
- Part 2 of the RMA.

13.1 Relevant provisions of the NPS, NZCPS, RPS and NRMP

These assessments were outlined in Section 11 above.

13.2 Assessment of alternatives

With respect to s171(1)(b) of the RMA, the summary of the assessment of alternatives required for the extension to the existing main runway is set out in Section 9 above.

In summary, given NAL does not have sufficient interest in all of the land required for the work, NAL has undertaken a thorough, detailed and fit for purpose assessment of alternative options for undertaking the proposed extension to the existing main runway as described in Section 9 of this Report.

The option assessment process has involved assessments undertaken by a multi-disciplinary team.

The extended Designation DAA1 (and associated amendments to DAA2 and DAA3) which will provide for the proscribed alignment and configuration of the northern runway extension (as identified in **Attachment B**) was assessed as the technically preferred option from work across multiple fields.

The 'Northern Option' is considered the more appropriate in terms of construction feasibility, economic efficiency, and ecological and landscape effects.

In terms of noise exposure, whilst the northern option represents an increase in the number of residences subject to future aircraft noise than the Southern Option that was considered, the level and extent of dwellings affected will still be less than those impacted by the Airport noise as provided for under the operative NRMP boundaries. In addition, NAL is proposing to establish an AMP that is not provided under the operative Designation. As the extent of the OLS in Designation DAA3 is based on the configuration of the runway, no alternative sites or routes can reasonably be considered in respect of that Designation.

13.3 The reasonable necessity of the work and the Designations

Section 171(1)(c) of the RMA requires consideration of whether the work and designation are reasonably necessary for achieving the objectives of which the requiring authority for which the designation is sought.

*Nelson Airport's **objectives** for altering its existing designations are to:*

- ~ *Extend the operational runway length in order to ensure that over the next 30 years the aeronautical capacity of the airport and runway system can safely and efficiently:*
 - *provide increased operational resilience and reliability*
 - *enable forecast demand and accommodate future aircraft types.*
- ~ *Enable an efficient, flexible and sustainable approach to developing Airport infrastructure, facilities and services.*
- ~ *Minimise the effects of aircraft noise impacts on the surrounding community as far as practicable whilst also minimising adverse environmental and cultural effects.*

'Reasonably necessary' in the context is to be understood as requiring something less than 'absolutely necessary' or essential. It is also important to note that as a requiring authority, NAL is entitled to establish its own priorities and objectives in relation to the Airport, provided those objectives do not predetermine the consideration of alternatives – as have been considered in Section 6.

The project objectives respond directly to the defined problems identified by the Airport and its experts in terms of providing for anticipated changes in sustainable aviation through to 2050, given existing capacity and infrastructural constraints associated with the existing Airport configuration and runway length.

13.3.1 Reasonable necessity of the work to achieve NAL's objectives

13.3.1.1 Extend the runway to provide for increased operational resilience and reliability

Nelson Airport is well served by airlines. Frequent air services connect Nelson to Auckland, Wellington, Christchurch, and other regional ports. The Nelson region's relative remoteness and the connectivity offered by airlines contributes to Nelson Airport being one of New Zealand's busiest airports.

However, Nelson Airport's current runway (which is among the shortest in the world catering for the types of aircraft it services) currently leads to payload restrictions for some aircraft currently operating to and from Nelson. In particular, under certain weather conditions, passenger and freight capacity are limited, which has a consequential impact on serviceability and reliability for travellers. Both Air New Zealand and Originair have confirmed a longer runway would remove those restrictions. It is critical to the economic success and operational resilience of the Airport, that it is well equipped and prepared with the necessary infrastructure to accommodate aircraft and passenger volumes in the future.

An extension to NAL's existing runway, including the provision of RESA, will ensure NAL's facilities are futureproofed and will enable the Airport to meet future demand, as well as provide a safe operating environment for aircrafts and passengers. This will provide for increased operational resilience and reliability of the Airport.

13.3.1.2 *Extend the runway to enable forecast demand and accommodate future aircraft types*

The global aviation industry is increasingly focussed on developing and operating more sustainable, greener aircrafts in order to decarbonise the industry. In 2019, domestic and international aviation accounted for 6% of New Zealand's total gross greenhouse gas emissions. More recently, the Government has noted that liquid hydrogen will play a key part in the decarbonisation of aviation in New Zealand, through long-term projects such as examining the potential and trialling hydrogen hubs at airports.

In anticipation of a shift to low-emission and zero-emission aircraft, Nelson Airport has identified that it requires an extension to its existing main runway to ensure the Airport can accommodate these next generation aircraft. As part of its initial consideration of the need to extend its runway, NAL commissioned work from various aviation research firms and consultancies on the implications of low-emission and zero-emission aircraft technologies for Nelson Airport. All reports support the reasons for NAL's need to progress the development of a longer runway, if it wished to support the introduction of next generation of aircraft to Nelson. These reports are included as **Attachment F** to this report.

In summary those reports confirmed that:

- Zero-emissions aircraft could be powered by new emerging technology, such as batteries, hydrogen fuel cells, and hydrogen combustion gas turbines. It is likely that battery electric and hydrogen fuel cell aircraft will enter into service before 2030, while hydrogen combustion aircrafts are expected to enter into service by 2035. Zero-emissions aircraft will be considerably heavier than comparable fossil fuelled aircraft. For example, battery electric aircraft are heavier by about 25 – 40%. Similarly, hydrogen fuel cell retrofitted aircraft would also likely have an increase in their maximum takeoff mass (MTOM) of around 5 – 10%.
- These increases in aircraft weight and MTOM relative to those of current fossil-fuelled aircraft, would present problems for operations at Nelson Airport with its current runway length of 1,347m. Currently, an ATR 72-600's (which is the largest turboprop aircraft to operate out of Nelson) stated takeoff field length is 1,315m. However, if the same aircraft were to be retrofitted with hydrogen fuel cell propulsion, it will require a runway that is up to 10% longer than the original aircraft's stated takeoff field length.
- Analysis has shown that purpose designed zero-emissions aircraft types, likely to replace the ATR 72-600, will likely require between 1,373m and 1,530m of runway length, resulting in these aircraft being incompatible with Nelson's existing runway. Therefore, as zero-emissions aircraft will likely be larger and heavier than equivalent fossil fuel designs and configurations currently serving Nelson, Nelson Airport will be required to provide additional runway length if it wishes to accommodate these new types of zero-emission aircraft.
- A reality of the aviation industry is that aircraft, particularly zero-emissions aircraft, are designed to reflect the requirements for size, range and performance made by aircraft manufacturers' more significant offshore customers. If those designs do not meet the operational performance requirements for shorter runways, such as those in Nelson, the region is vulnerable to service limitations which will have a detrimental effect on the city's and wider region's economies. Currently, Nelson is already an outlier in terms of runway length relative to market size.
- Given Nelson's regional nature, all ports served from this Airport are within 500 kilometres, and entirely flown by turboprop aircraft suitable for zero-emissions

technology. All current airline routes out of Nelson Airport can feasibly be serviced by upcoming battery electric and hydrogen fuel cell aircraft. Nelson Airport's preparedness to service these aircraft when they begin commercial operations will speed up the decarbonisation of the aviation industry and will assist in reaching New Zealand's carbon zero goal by 2050.

Given the above, Nelson Airport is seeking to extend its existing runway to ensure it has the operational capacity to service and accommodate the expected infrastructural needs of future zero-emissions aircraft likely to service Nelson.

13.3.1.3 Ability to enable an efficient, flexible and sustainable approach to developing Airport infrastructure, facilities and services.

The commentary under the above objective is equally applicable for this objective. Ultimately, an extension to Nelson Airport's existing runway length will assist with its preparedness to be an efficient, flexible and sustainable Airport and ensure Nelson Airport can accommodate future sustainable aircraft types.

13.3.1.4 Ability to minimise the effects of aircraft noise impacts on the surrounding community as far as practicable whilst also minimising adverse environmental and cultural effects

As identified in Section 10, there is a degree of adverse effects associated with an extended Designation DAA1 to facilitate a runway length of 1,510m and associated RESA to:

- Reduce or remove current limitations on passenger and freight capacity under certain weather conditions, thereby improving reliability for travellers, businesses and their customers;
- Provide for RESAs in conjunction with a runway extension to improve the operational safety aircraft operations; and
- Facilitate future sustainable aircraft that are likely to be heavier than current types and require more runway length.

The extent of potential effects, particularly in terms of archaeology, geotechnical hazards, ecology and landscape have primarily been avoided in the first instance through the selection of the proposed option. Potential adverse effects from this option have then been considered, and conditions proposed to address residual matters associated with visual amenity, and the ecology and natural character associated with the Maire Stream tributary.

Management of noise effects has been considered within a dual framework under the NoR and PPC that seeks to strengthen the approach in the operative NRMP associated with the monitoring and management of Aircraft Operations (including through the introduction of a comprehensive AMP to offer acoustic treatment and / or ventilation measures to existing lawfully established residential units in the Residential Zone) while also providing a more directive approach in the NRMP as to the management of ASAN around the Airport. Such an approach represents a balanced and reasonable approach to managing the effects associated with the NoR and is consistent with the approach outlined in NZS6805:1992. The NoR also seeks to confirm and clarify the role and composition of the NANEAC and require the development of an Airport NMMP.

Engagement with iwi is ongoing. Conditions proposed in the NoR seek to manage cultural effects through a Kaitiaki Forum which will assist NAL in further understanding the cultural values of the area and inform approaches to management of cultural effects as the northern runway extension is designed and constructed.

13.3.2 The necessity of the Designations to achieve NAL's objectives

In determining the most effective way to achieve its objectives, alternative methods potentially available to NAL were considered. Options available include applying for land use consents or the use of NAL's requiring authority status to seek an alteration to its existing Designations.

Alterations to NAL's existing designations in the NRMP were deemed to be the most appropriate as NAL already holds designations for the existing Airport and the designations will:

- ~ allow the land required to be identified in the NRMP as being used for Airport purposes giving a clear indication of the intended use of the land;
- ~ protect the proposed spatial extent of Designation DAA1 from future development that would prevent or hinder the construction of the runway extension;
- ~ prevent structures and buildings from intruding into the amended OLS (Designation DAA3) designed to facilitate safe passage for landing and take offs associated with the Airport; and
- ~ allow NAL to undertake the works necessary for the runway extension within the area subject to the NoR, subject to gaining any other necessary approval such as regional consents.

Overall, NAL considers that it is therefore reasonably necessary and appropriate to recognise and provide for the Airport, in meeting its Objectives, by way of designation(s).

13.4 Relevant Other Matters

Pursuant to s171(1)(d) RMA, the "other matters" which are relevant to the consideration of the NoR are set out below.

13.4.1 The Purpose of Designation DAA1

The Designation Purpose for DAA1 is defined as 'Airport and Aerodrome Purposes'.

This is appropriate given the statutory definition of Airports / Aerodrome is used interchangeably in relevant legislation:

The Airport Authorities Act 1966 –defines "airport" as:

"Airport" means any defined area of land or water intended or designed to be used either wholly or partly for the landing, departure, movement, or servicing of aircraft; and includes any other area declared by the Minister to be part of the airport; and also includes any buildings, installations, and equipment on or adjacent to any such area used in connection with the airport or its administration"

The Public Works Act 1981 defines "aerodrome" as:

"aerodrome means any defined area of land or water intended or designed to be used either wholly or partly for the landing, departure, movement, and servicing of aircraft; and includes any buildings, installations, roads, and equipment on or adjacent to any such area used in connection with the aerodrome or its administration; and also includes any defined airspace required for the safe operation of aircraft using the aerodrome; and also includes a military airfield"

The Civil Aviation Act 1990 defines "aerodrome" as:

"aerodrome"

(a) means any defined area of land or water intended or designed to be used either wholly or partly for the landing, departure, and surface movement of aircraft; and

(b) includes any buildings, installations, and equipment on or adjacent to any such area used in connection with the aerodrome or its administration

"approach control service" means an air traffic control service for arriving or departing controlled flights"

The definition of "airport" in the RMA is:

"Airport means any defined area of land or water intended or designed to be used, whether wholly or partly, for the landing, departure, movement, or servicing of aircraft:"

13.4.2 Rautaki-hananga-o-Aotearoa New Zealand Infrastructure Strategy (2022 – 2052)

Section 6.2 of the Strategy 'Supporting Towns and Regions to flourish' states:

"Currently, the air services to our regions are infrequent and expensive. The rise of electric aviation and autonomous mobility solutions may help ease these pressures, boost competition and change the nature and economic viability of commercial regional air services. This technology is expected to become more common within the next decade, but to prepare for this, significant training and infrastructure preparation is required to support operations on existing runways."

Associated Recommendation 11 states:

Prepare for zero-emissions commercial electric flights and unmanned aircraft.

13.4.3 Summary 'Other Matters'

NZS6805:1992 remains the appropriate assessment tool for the consideration of health and annoyance effects of noise exposure associated with the NoR, and measures incumbent on NAL to manage those effects. These matters are comprehensively addressed in **Attachment K2**.

Other relevant matters go to the manner in which both Airport and Aviation purposes are to be recognised in Designation DAA1, and the array of activities enabled therein.

The New Zealand Infrastructure Strategy (2022 – 2052) is relevant in that it expressly identifies that regional airports should be planning to provide the infrastructure that will be required to support zero-emission aircraft, as is sought to be facilitated through the NoR.

13.5 Part 2

The NoR is subject to overarching provisions of Part 2 of the RMA. This assessment is described in Section 16 of this report below.

13.6 NoR(s) conclusions with regard to s171

NAL is seeking to designate the land shown in **Attachment B2** (DAA1), **Attachment B3** (DAA2) and **Attachment B4** (DAA3) for Airport and Aerodrome purposes, ANB and Airport Height Restrictions respectively.

The statutory effect of the designations is to provide NAL with:

- ~ the ability to provide for the northern runway extension, and account for commensurate changes in the ANB Controls and OLS protections; and
- ~ certainty as to the ability to pursue the runway extension, with sufficient flexibility and efficiency.

The assessment has demonstrated that:

- ~ the designations and work are **reasonably necessary**¹⁴⁴ to achieve the NAL's objective as set out in Section 13.3;
- ~ NAL has **adequately considered alternative sites, routes and methods**¹⁴⁵ for undertaking the work as set out in Section 9;
- ~ the NoR achieves **Part 2 of the Act**¹⁴⁶ as set out in Section 16, in considering the **effects on the environment**¹⁴⁷ (Section 7) having **particular regard to relevant planning provisions**¹⁴⁸ (Section 11).

Nelson Airport is recognised as nationally and regionally significant infrastructure (including within the NPS-UD) and a transportation asset for Nelson Region and country.

The existing Designations DAA1, DAA2 and DAA3 are outdated, and no longer the more appropriate or fit for purpose for managing Airport activities, including the more orthodox and contemporary approach towards managing aircraft noise as set out in NZS6805:1992.

It is considered appropriate that ongoing airport planning and infrastructure investment (including for the northern runway extension) is provided for via the Designations in the NRMP.

¹⁴⁴ S171(1)(c).

¹⁴⁵ S171(1)(b).

¹⁴⁶ S171(1).

¹⁴⁷ S171(1).

¹⁴⁸ S171(1)(a).

14 Section 32 Evaluation – PPC

Clause 22(1) of Schedule 1 of the RMA requires that an evaluation report for the PPC be prepared in accordance with section 32 of the RMA. Section 32 sets out the matters to be considered in an evaluation report and requires that an evaluation must examine whether, having regard to efficiency and effectiveness, the policies, rules or other methods are the “most appropriate” to achieve the objectives of the PPC and the purpose of the RMA. Within this, an evaluation must take into account the benefits and costs of policies, rules or other methods. In determining the most appropriate methods, consideration of alternatives is required.

14.1 Private Plan Change issues and extent

The NRMP was made operative on 1 September 2004. In the intervening period:

- the nature and role of what constitutes a modern airport, and appropriate land use activities therein has evolved the role and function of Nelson Airport as nationally and regionally significant infrastructure is not appropriately recognised and provided for in the operative NRMP; and
- the operative zoning as Industrial Zone and Open Space and Recreation Zone does not reflect the activities, infrastructure or operations of a commercial Airport, as coupled with the National Planning Standards (2019) Zone Framework Standard which prescribe an ‘Airport Zone’ as the more appropriate zoning.

Accordingly, an Airport Zone and supporting changes are proposed to the NRMP through the PPC. These changes include:

- Formation of Chapter 15 Airport Zone, and relevant provisions associated with that land contained within Designation DAA1 as proposed in the NoR.
- Amendments to Chapter 5 District Wide provisions to strengthen the role and function of Nelson Airport as both nationally and regionally significant infrastructure and incorporate objectives and policies to manage reverse sensitivity effects on Nelson Airport.
- Amendments to Chapter 11 Industrial provisions to remove provisions that related to Nelson Airport (as they are now contained in the Airport Zone).
- Amendments to Chapter 7 Residential, Chapter 10 Industrial, Chapter 11 Open Space and Recreation, Chapter 4 Suburban Commercial and Chapter 14 Conservation to provide a consistent rule suite avoiding ASAN from establishing (and managing an increase of intensity of those activities) with the AECO and ANB.
- Inserted and amended Definitions to Chapter 2 Interpretation to provide for the above.

14.2 Statutory Context and Section 32

The overarching principles of section 32 must also be considered, namely:

- (a) Are the objectives the most appropriate to achieve the purpose of the RMA?
- (b) Are the policies the most appropriate way to achieve the objectives?

- (c) Will the policies be an effective and efficient way to achieve the objectives (by assessing benefits and costs - in a quantifiable way if possible - including the opportunities for economic growth and employment)?
- (d) Will there be a risk of acting or not acting (i.e. including policies or not including policies) if there is uncertain or insufficient information?

The operative statutory hierarchy is considered in Section 11, with the provisions contained in **Attachment Q**.

14.3 Appropriateness of the proposal to achieve the purpose of the RMA

The PPC provides an Airport Zone which is the more appropriate way to achieve the purpose of the RMA than the Operative Industrial and Open Space and Recreational Zone applied to the site. As set out below, it is considered that the proposal is the more appropriate way to achieve the purpose of the RMA. The zoning is inextricably intertwined with the respective Objectives that accompany that zoning, and its integration with the wider structure and context of the NRMP. Accordingly, as the PPC includes proposed objectives, under section 32(6), the proposed objectives are the subject of this assessment. However, as explained above for completeness, the below assessment considers the proposed broad Airport zone overall, as well as the objectives.

14.3.1 Analysis of Broad Options (the Zone)

Section 32 of the RMA requires the analysis of the requested PPC as well as alternative options to determine the most appropriate method to achieve the objectives.

In addressing the current proposal, the broad options considered are:

- ~ **Option A** - Status quo
- ~ **Option B** - Amend the Designations only (DAA1, DAA2 and DAA3)
- ~ **Option C** – Review and amend the existing operative Industrial Zone and Open Space and Recreation Zone provisions
- ~ **Option D** - Amend both the Designation and Zone provisions associated with embedding an Airport Zone, strengthen District Wide Provisions, and embed a consistent approach to managing ASAN

The following Table 13 provides a brief summary of the advantages and disadvantages of these options, supporting the decision to proceed to a plan change.

Having undertaken the analysis, the preferred option is Option D taking a holistic and integrated approach to amending the NRMP provisions to align with the NoR as also proposed in this Report. This option demonstrates a higher level of efficiency with advantages outweighing disadvantages.

Table 13: Broad Level Section 32 of Options

Option	Advantages	Disadvantages	Efficiency ¹⁴⁹ and effectiveness ¹⁵⁰
Option A - Status Quo: Continue with the existing situation.	~ No costs for plan change process.	~ Does not account for long term operational changes to airport infrastructure to improve resilience and safety improvements and facilitate future needs for aviation connections. ~ Retains existing operative NRMP provisions, which do not provide a clear definition of activities to be enabled at the Airport. ~ Does not adequately recognise the Airport landholdings and operations as nationally and regionally significant infrastructure. ~ Applies an incomplete approach to reverse sensitivity in terms of policy and plan rules managing ASAN, as it is unaligned with NZS6805:1992 which seeks to avoid ASAN within both the ANB and OCB (55 dB Ldn). ~ Reduces the sustainability of the existing resource and infrastructure, and the investment already made in Airport land holdings. ~ Does not align completely with higher order planning documents.	Efficiency: Social: <ul style="list-style-type: none"> Disjunct between operative FANC and actual noise exposure. Very limited requirements for mitigation and management of ASAN leading to higher levels of community annoyance at Aircraft Operations. Poor alignment with NZS6805:1992. Economic: <ul style="list-style-type: none"> Does not resolve existing resilience and reliability issues associated with current runway configuration. Limited ability for Nelson Airport to respond to requirements of sustainable aircraft and provide for activities that support the role and function of the Airport. Environmental: <ul style="list-style-type: none"> Amenity incompatibilities between ASAN and Aircraft Operations. Effectiveness: Social:

¹⁴⁹ The measure of whether the provisions will be likely to achieve the objectives at the lowest total cost to all members of society, or achieves the highest net benefit to all of society.

¹⁵⁰ The measure of contribution new provisions make towards achieving the objectives of the plan, and how successful they are likely to be in solving the problem they were designed to address.

Option	Advantages	Disadvantages	Efficiency ¹⁴⁹ and effectiveness ¹⁵⁰
			<ul style="list-style-type: none"> Reverse sensitivity incompatibilities, including with potential increases in residential density. <p>Economic:</p> <ul style="list-style-type: none"> Does not provide for the effective development and operation of the Airport as infrastructure. <p>Environmental:</p> <ul style="list-style-type: none"> Disjunct between amenity settings in the NRMP and those received at proximate residential properties to Aircraft Operations. Disjunct in Strategic Directions (Chapter 5 District Wide) provisions as to the role and function of the Airport in terms of urban form and growth.
Option B - Amend the Designations Only	<ul style="list-style-type: none"> ~ No costs for plan change process. ~ Establishes the range of activities able to be undertaken, including runway extension, and composite ANB under DAA2 and composite OLS under DAA3. ~ Provides certainty to NAL and the community as to Nelson Airport's long term plans. ~ No costs for a plan change process. 	<ul style="list-style-type: none"> ~ Disjunct between the Designations, and the subsequent management of ASAN within the surrounding community. ~ Current Industrial and Open Space and Recreation Zone does not adequately reflect existing operations and infrastructure, nor future range of activities anticipated from a modern Airport. ~ Absence of District Wide provisions adequately recognising the Airport landholdings and operations as nationally and regionally significant 	<p><u>Efficiency:</u></p> <p><i>Social:</i></p> <ul style="list-style-type: none"> <i>Disjunct between operative FANC contained and anticipated by the Designation and respective land use controls on ASAN.</i> <i>Unaligned with NZS6805:1992.</i> <p><i>Economic:</i></p> <ul style="list-style-type: none"> <i>Resolves in part existing resilience and reliability issues associated with current runway configuration.</i> <i>Limited ability for Nelson Airport to respond</i>

Option	Advantages	Disadvantages	Efficiency ¹⁴⁹ and effectiveness ¹⁵⁰
		<p>infrastructure.</p> <ul style="list-style-type: none"> ~ Does not provide a cohesive management response between the Designation and associated landuse provisions in the NRMP. ~ Does not result in consistency with higher order planning documents. ~ Does not implement the National Planning Standards and mandatory directions as to the most appropriate zoning response to Airport landholdings and effects. 	<p><i>to requirements of sustainable aircraft and provide for activities that support the role and function of the Airport.</i></p> <p><i>Environmental:</i></p> <ul style="list-style-type: none"> • <i>Amenity incompatibilities between ASAN and Aircraft Operations.</i> <p><u>Effectiveness:</u></p> <p><i>Social:</i></p> <ul style="list-style-type: none"> • <i>Reverse sensitivity incompatibilities, including with potential increases in residential density.</i> <p><i>Economic:</i></p> <ul style="list-style-type: none"> • <i>Does not provide for the effective development and operation of the Airport as infrastructure.</i> <p><i>Environmental</i></p> <ul style="list-style-type: none"> • <i>Disjunct between amenity settings in the NRMP and those received at proximate residential properties to Aircraft Operations.</i> • <i>Disjunct in Strategic Directions (Chapter 5 District Wide) provisions as to the role and function of the Airport in terms of urban form and growth.</i>
Option C - Review and amend the Industrial Zone and Open Space and	~ Could strengthen the role and function of the Airport, and range of activities anticipated.	~ Absence of District Wide provisions adequately recognising the Airport landholdings and operations as nationally and regionally significant	<p><u>Efficiency:</u></p> <p><i>Social:</i></p> <ul style="list-style-type: none"> • <i>Improves consistency of operative FANC</i>

Option	Advantages	Disadvantages	Efficiency ¹⁴⁹ and effectiveness ¹⁵⁰
Recreation Zone provisions to better provide for Airport operations (and amend the Designations)	<ul style="list-style-type: none"> ~ Increased cohesive land use management and integration between updated zoning / overlays and amended designations. ~ The amendment of the designations enables runway extension. ~ Bespoke provisions, such as those for the management of Compass Swings or broader range of appropriate activities could be included in an Industrial zone overlay. 	<ul style="list-style-type: none"> infrastructure. ~ Does not allow for consistent management of ASAN in surrounding zones. ~ Does not result in consistency with higher order planning documents. ~ Does not implement the National Planning Standards and mandatory directions as to the most appropriate zoning response to Airport landholdings and effects. ~ Costs associated with a Plan Change. 	<p><i>contained and anticipated by the Designation and respective land use controls on ASAN.</i></p> <p><i>Economic:</i></p> <ul style="list-style-type: none"> • <i>Resolves in part existing resilience and reliability issues associated with current runway configuration.</i> • <i>Limited ability for Nelson Airport to increase functional amenity and diversity through modernising the Plan Provisions.</i> • <i>Poor 'fit' of Industrial and Open Space and Recreational Zone provisions to Airport role and function.</i> <p><i>Environmental:</i></p> <ul style="list-style-type: none"> • <i>Amenity incompatibilities between underlying Industrial zoning and anticipated range of effects generated from Aircraft Operations.</i> <p><u>Effectiveness:</u></p> <p><i>Social:</i></p> <ul style="list-style-type: none"> • <i>Unaligned with NZS6805:1992 as it relates to Residential Zones (and NRMP provisions) within the ANB and AEEO.</i> <p><i>Economic:</i></p> <ul style="list-style-type: none"> • <i>Does not provide for the effective development and operation of the</i>

Option	Advantages	Disadvantages	Efficiency ¹⁴⁹ and effectiveness ¹⁵⁰
			<p><i>Airport as infrastructure.</i></p> <p><i>Environmental</i></p> <ul style="list-style-type: none"> <i>Disjunct in Strategic Directions (Chapter 5 District Wide) provisions as to the role and function of the Airport in terms of urban form and growth.</i>
<p>Option D - The Plan Change:</p> <p>Incorporate a revised Policy Framework (including Chapter 5 District Wide Provisions)</p> <p>And</p> <p>Specify the range of activities provided for, and bespoke controls for engine testing and Compass Swings</p> <p>And</p> <p>Divide the zone into precincts within which different outcomes and activities are anticipated.</p> <p>(and amend the</p>	<p>~ Implements the National Planning Standards mandatory direction as to application of Airport Zone.</p> <p>~ Establishes a policy framework against which activities (outside the designation) can be measured and considered.</p> <p>~ Increased cohesive land use management and integration between updated zoning / overlays and amended designations.</p> <p>~ Establishes a policy framework that places the strategic role and function of the Airport within the broader context of urban form and growth, including inserting a consistent and proactive approach to the management of reverse sensitivity effects (and informing new Plan Changes, such as PC29, in terms of avoidance of increasing the intensity of ASAN).</p> <p>~ Establishes what activities are anticipated or not within the zone, and the implications for wider strategic form</p>	<p>~ Costs associated with plan change process.</p> <p>~ Integration challenges within the operative NRMP given that the operative date was 2004.</p>	<p><u>Efficiency:</u></p> <p><i>Social:</i></p> <ul style="list-style-type: none"> <i>Improves consistency of operative FANC contained and anticipated by the Designation and respective land use controls on ASAN.</i> <i>Ensures consistency on managing ASAN within the OCB 55dB L_{dn} - 60dB L_{dn} as aligned with NZS6805, limited restrictions 60dB L_{dn} to 65dB L_{dn}.</i> <i>Promotes an integrated approach to Noise Management, extending to Aircraft Operations, Engine Testing and Compass Swings, and how these are managed under the Airport Zone.</i> <p><i>Economic:</i></p> <ul style="list-style-type: none"> <i>Resolves resilience and reliability issues associated with current runway configuration.</i> <i>Improves ability for Nelson Airport to increase functional amenity and diversity through modernising the Plan Provisions to</i>

Option	Advantages	Disadvantages	Efficiency ¹⁴⁹ and effectiveness ¹⁵⁰
Designations)	<p>(i.e. management of commercial and retail activities).</p> <ul style="list-style-type: none"> ~ Provides rules limiting activities to ensure appropriateness to the zone. ~ Rolls over the respective 'natural values and regional matters' from the Industrial zone provisions to ensure consistency as to how those values are managed. 		<p><i>reflect role of modern Airport.</i></p> <p><i>Environmental:</i></p> <ul style="list-style-type: none"> • <i>Outstanding matters and costs associated with conditions associated with Landscape and Ecology under Designation DAA1.</i> <p><u>Effectiveness:</u></p> <p><i>Social:</i></p> <ul style="list-style-type: none"> • <i>Aligns the dual approach to noise exposure management, including the Airport Operators role in facilitating insulation / ventilation as required, and directive provisions to avoid additional ASAN.</i> <p><i>Economic:</i></p> <ul style="list-style-type: none"> • <i>Provide for the effective development and operation of the Airport as infrastructure.</i> • <i>Increases resilience and reliability of Airport infrastructure.</i> <p><i>Environmental</i></p> <ul style="list-style-type: none"> ~ <i>Consistent approach in Strategic Directions (Chapter 5 District Wide) provisions as to the role and function of the Airport in terms of urban form, growth and reverse sensitivity effects as aligned with an Airport Zone.</i>

14.4 NRMP Provisions that are not amended

The purpose of the PPC is to ensure strategic integration of the Airport within the NRMP, introduce the Airport Zone in relation to the District Plan regulation, and apply a consistent approach to the management of ASAN in surrounding zones. Accordingly, the PPC does not seek to amend provisions (objectives and policies) relating to Natural Values contained within Chapter 5 -District Wide Provisions.

In addition, in terms of specific rule provisions, Table 14 below identifies which provisions have been 'rolled over' into the new Airport Zone without amendment from the operative Industrial zone provisions.

Table 14: Roll-over Industrial Rules

Matter	Industrial Zone Provision – Chapter 10	Airport Zone Provision – Chapter 15
Aircraft Engine Testing	INr.26	AIRPz.29
Buildings Structures and Height	INr.27	AIRPz.31 (noting 15m height in Core Precinct)
Setback from roads	INr.28	AIRPz.32 (noting aviation exemptions)
Setback from residential boundaries	INr.29	AIRPz.33 (noting aviation exemptions)
Buildings alongside drains and water mains	INr.32	AIRPz.34
Signs	INr.33	AIRPz.35
Outdoor Storage	INr.34	AIRPz.36
Parking and Loading	INr.35	AIRPz.37
Access	INr.36	AIRPz.38
Airport noise – Aircraft Noise Management	INr.40	AIRPz.40
Lightspill	INr.41	AIRPz.42
Disposal of trade waste to sewer	INr.43	AIRPz.43
Radiofrequency exposure levels	INr.48	AIRPz.44
Network utility	INr.49	AIRPz.45
Earthworks	INr.54	AIRPz.46
Landfill	INr.54A	AIRPz.47
Building on low lying sites	INr.53	AIRPz.48
Service Overlay Building	INr.55	AIRPz.49
Coastal Environment Overlay	INr.56	AIRPz.50

Matter	Industrial Zone Provision – Chapter 10	Airport Zone Provision – Chapter 15
Inundation Overlays low lying ground	INr.60	AIRPz.51
Heritage Buildings, Places and Objects – alterations Group B	INr.61	AIRPz.52
Heritage Buildings, Places and Objects – demolition Group B	INr.63	AIRPz.53
Subdivision	INr.73	AIRPz.54

As these provisions have not been materially amended, the s32 analysis does not consider these further.

14.5 Examination of new or amended objectives

There are two Chapters within the NRMP requiring modification or new Objectives.

Chapter 5 – District Wide

The existing Chapter 5 – District Wide provisions do not accurately reflect the current operations at Nelson Airport, or Nelson Airport's role as nationally and regionally significant infrastructure. The existing provisions do not align with the guidance provided in NZS6805:1992. Amendments are required to recognise the importance of Nelson Airport in terms of compatibility with urban form and growth. In this way the amended objectives are a more appropriate means of achieving the purpose of sustainable management set out in section 5 of the RMA than the operative objectives.

The sustainable management of the natural and physical resources of the airport land will be better achieved through improved clarity in the objectives in terms of the role and function of the Airport, and compatibility and integration with wider urban form.

- ~ **Chapter 5 – District Wide Matters: Objective DO11.1 Air Transport** to recognise the role of the Airport as nationally and regionally significant infrastructure, and to better articulate the dual responsibilities contained within NZS6805:1992 in terms of the Airport's role in managing noise effects, and the strategic need to avoid reverse sensitivity effects on the Airport.
- ~ **Chapter 5 – District Wide Matters: Objective DO15.1 Urban Form** to insert reference to the requirement for urban form to also be compatible with nationally and regionally significant infrastructure.

Chapter 15 – District Wide

Application of the National Planning Standards as to the formation of an Airport Zone requires a complete plan framework including Objectives, Policies and Rules.

In terms of forming the Objectives for the Airport Zone, as raised in this report there is a need for Nelson Airport to have a more explicit and directive role in the NRMP to ensure that Nelson

Airport is foremost recognised as nationally and regionally significant infrastructure and that the need for the continued use and development of the Airport, in terms of its economic and social role for the wider region and country is provided for.

In drafting the most appropriate objectives¹⁵¹ for the Airport Zone, and bringing together the above, it is considered that there are three Objectives, being:

- ~ **Recognition** – Recognition for the efficient use and development of Airport resources and operations as nationally and regionally significant infrastructure, given wider community economic and social benefits.
- ~ **Provision** - Range of activities as anticipated within each of the Precincts and the need for these activities to remain compatible with overall urban form, and wider community expectations associated with the Nelson CBD and commercial centres.
- ~ **Environmental Quality** – Adverse effects are managed, including amenity values at neighbouring zones such that the environmental qualities of the Airport zone, including noise exposure and operational areas are reflective of the role and function of Nelson Airport.

The Objectives proposed in the PPC for the Airport Zone (Chapter 15) are:

AIRPZ-O1 Recognition as Nationally and Regionally Significant Infrastructure

The Airport zone recognises and provides for the efficient use and development of Nelson Airport's resources and operations as nationally and regionally significant infrastructure.

AIRPZ-O2 Role and function

The Airport zone provides for the safe and efficient use and development of Nelson Airport and facilitates a planned approach to its future development, in a manner that identifies Precinct areas with distinct character and uses, being:

1. PREC1 – Core airport precinct, which provides for essential airport infrastructure, aviation operations and expansion.
2. PREC2 – Airport environs precinct, which supports a mix of business activity, including industry, airport related activity, and tourist and visitor / workforce support activities.
3. PREC3 Airport coastal precinct which provides for uses adjoining the Coastal Marine Area.

AIRPZ-O3 Environmental quality

Adverse effects, including those on amenity values of neighbouring zones, are managed such that the environmental qualities of the Airport Zone, including noise exposure and operational areas, are reflective of the role and function of Nelson Airport.

¹⁵¹ Section 32(1)(a) Resource Management Act 1991.

The proposed objectives for the Airport Zone are supported by a comprehensive set of policies and a revision of the rule provisions (see analysis below) which together can ensure that the objectives are able to be realised.

The modified Objectives to Chapter 5 and insertion of Objectives associated with Chapter 15 are considered the more appropriate in achieving the purpose of the RMA based on:

- ~ recognition of Nelson Airport as nationally and regionally significant infrastructure, as identified in the NPS-UD and NPS-FM.
- ~ insertion of the dual responsibilities between:
 - o management of aircraft operational noise; and
 - o ensuring urban form is compatible with Airport Operations, including constraints on ASAN.
- ~ a more appropriate reflection of sustainable management as set out in Part 2 of the Act, accounting for Section 5 in terms of the management of the Airport as a physical resource which enables economic and social wellbeing including meeting the reasonably foreseeable needs of future generations, whilst managing effects on the environment (s5(2)(c)), as well as effects on amenity (s7c) and the quality of the environment (s7(f)).
- ~ Responding to the National Planning Standards as to the formation of an Airport Zone and ensuring an appropriate suite of Objectives are provided to represent 'sustainable management' of the natural and physical resources of the Airport zone.

The objectives associated with Chapter 5 clarify the purpose of the Airport Zone (AIRPz), within the 'recognition' and 'provision' categorisations above, so as to provide clarity around future development within the Airport Zone.

- ~ This is underpinned by AIRPZ-01 which embeds the importance of the long-term development and operation of the Airport as both nationally and regionally significant infrastructure. That approach recognises the broader importance of the Airport to the region and provides a basis for allowing its operations to continue where effects associated with such operations are not able to be internalised within the Zone.
- ~ Proposed AIRPZ-02 sets a clear statement as to activities anticipated within each of the Precincts within the zone. These activities link back to NAL's longer term strategic planning for the Airport as documented in the Airport's 2050 Master Plan. The approach provides certainty as to operations expected to be undertaken in these areas during the life of the NRMP. For the Airport Environs Precinct, where a wider range of activities are anticipated, limitations are included in their establishment and design to ensure land use remains appropriate with the NRMP's strategic approach to growth.
- ~ Lastly, the operation and function of Nelson Airport have implications for the quality of this environment, which AIRPZ-03 acknowledges. While some policy direction for positive outcomes is appropriate, this must also recognise that intrinsically, the Airport is a working environment, with both built form and environmental effects driven by the functional and operational needs of a modern airport. There are also a number of built form consequences as associated with ensuring / managing safety with airport operations, such as security fencing, runway strips, navigational lighting

and RESA, in accordance with Civil Aviation requirements. This objective recognises the importance and realities of these safety obligations, as well as those that interface with the Airport Zone such as Airways Corporation of NZ.

14.6 Whether the policies, rules and standards are the most appropriate way to achieve the objectives

Section 32(1)(b) of the RMA requires an evaluation to examine whether the provisions in the PPC are the most appropriate way to achieve its objectives.

The PPC includes three (3) new objectives relevant to the proposed Airport Zone. In addition, section 32(3) requires that the assessment also consider the appropriateness of the provisions to achieve the objectives of the existing NRMP. For completeness, it is also considered appropriate to consider whether the proposed provisions are appropriate for achieving the purpose of the PPC (as set out in Section 7.1) which is the assessment for PPCs which do not contain objectives.

There are three aspects to the PPC that are considered in further detail below, these are:

- ~ introduction of the framework associated with the Airport Zone (AIRPz) – which by consequence include the deletion of the operative provisions contained within Chapter 10 – Industrial Zone;
- ~ amendments to Chapter 5 – District Wide Provisions; and
- ~ amendments to Zone provisions in the Plan to incorporate a consistent approach to the management of ASAN.

14.6.1 Airport Zone Framework

In summary (refer **Attachment A1** Interpretation and **Attachment A12** and **Attachment A13** Airport Zone) the amendments relate to:

- ~ policies and explanations to implement the Objectives;
- ~ amendments to the rules relating to activities permitted in the zone, including industry, retail and offices, and (roll-over) and retention of relevant Industrial zone rules ; and
- ~ integrating the Airport Zone with regional rules ‘carried over’ from the operative Industrial zone.

The provisions are also dependent on a number of key definitions which consolidate the range of activities anticipated at a modern Airport. The key definitions in relation to the rules, are:

- i. *Aviation Activity* (referenced in AIRPZ-P2 and P3).
- ii. *Airport Related Activity* (referenced in AIRPZ-P2 and P3).
- iii. *Commercial Activity* – (referenced in AIRPZ- P3). Defined in Chapter 2 Interpretation.
- iv. *Industrial Activity* - (referenced in AIRPZ- P3). Defined in Chapter 2 Interpretation and which incorporates manufacturing (i.e. aircraft maintenance), and distribution (freight and logistics).
- v. *Trade Supplier* (referenced in AIRPZ- P3).

The proposed **policies** are provided in **Attachment A12**. In summary, the policies:

- ~ AIRPZ.P1 Seek to enable the ongoing the role and function of the Airport Zone to meet future needs.
- ~ AIRPZ.P2 Provides for Aviation Activities and a range of Airport Related Activities to enable Nelson Airport to operate in a safe and efficient manner.
- ~ AIRPZ.P3 Provides for a broader range activity at the Airport as subject to limits associated with being compatible with aircraft operations and wider urban form.
- ~ AIRPZ.P4 Provides for a limited range of aviation activities within the Airport Coastal Precinct.
- ~ AIRPZ.P5 Addresses the quality, safety and design of the receiving environment.

The **rules** are to implement the policies¹⁵², and are to be considered (along with policies) as to their appropriateness in achieving the objectives, having regard to their efficiency and effectiveness¹⁵³.

The zone policies (and planning maps) establish three precincts within the Airport Zone, a general description and anticipated range of outcomes is provided in Table 15

Table 15: Precincts - Anticipated outcomes

<p>PREC16 Core Airport Precinct</p>	<p>This relates to the area sometimes referred to as ‘airside operations’ – it incorporates the operational aspects of a working airport including runways, taxiways and aircraft areas. This is the area for key airport activities also primarily covered by Designation DAA1.</p> <p>A broader mix of activities is not anticipated, ensuring that the resource associated with airside operations is efficient and effectively utilised solely for that purpose.</p> <p>Accordingly, the list of permitted activities largely relates to <i>Aviation Activities</i> and <i>Airport Related Activities</i>.</p>
<p>PREC17 Airport Environs Precinct</p>	<p>This relates to the development area of the Airport, and includes the majority of areas where built activity has already occurred, or future development and consolidation is anticipated.</p> <p>Some future development will be directly provided for under the Designation DAA1 and the primary purpose of the activities listed in the Airport environs precinct is to make it clear in the NRMP as to the range of activities anticipated in this area.</p>
<p>PREC18 Airport Coastal Precinct</p>	<p>The purpose of this precinct is to provide for a narrow range of activities associated with operational navigation, internal roading and safety immediately adjoining the CMA and Jenkins Creek; whilst recognising the values of these environments.</p>

¹⁵² Section 75(1)(c).

¹⁵³ Section 32(1)(b).

The range of uses and activities anticipated in the Airport Zone for each Precinct is shown in Table 13.

Table 16: Precinct Activities

Recommended Change 4 – Activities and Rules			
	Core Airport Precinct	Airport Environs Precinct	Coastal Precinct
<i>Aviation Activity</i>	✓	✓	✓*
Airport related activity	✓	✓	-
Engine Testing	✓	-	-
Compass Swings	✓	✓	-
Industrial Activity	-	✓	-
Retail Activity	-	✓**	-
<i>Trade Suppliers</i>	-	✓	-
<i>Service Station</i>	-	✓	-
Food and Beverage outlet (less than 100m ²)		✓	
Education Activity	-	✓	-
Farming	✓	✓	-
Recreational Activities	✓	✓	-

* limited to supporting infrastructure.

** In terminal (including Food and Beverage as nested in the definition of Retail)

Alternative approaches to the new policies, rules and methods include:

- ~ **Option A:** Retaining the existing operative NRMP provisions (with activities to be managed under the respective Open Space and Recreation Zone and Industrial Zone rules).
- ~ **Option B:** Being more enabling as to the range of activities able to be undertaken in the zone.
- ~ **Option C:** Providing a base Airport Zone and not providing for specific precincts.
- ~ **Option D:** The PPC policies, rules and precincts.

Table 17: Alternative Approach to the Plan – Rule framework

Alternative	Comment
Option A – Retaining the existing operative provisions.	This approach has been dismissed as not being the more appropriate option in Table 10.
Option B – Being more enabling	This would enable potentially significant levels of activity with character and intensity that would not be appropriate to the location or character of the area. There would also remain uncertainty over the direction of intended development and impacts on the wider Nelson city. This would also not give effect to the objectives in the NRMP, including those in Chapter 5.
Option C: No Precincts	Not delineating the precincts within the zone would make it difficult to direct activities to appropriate locations within the zone. This would not give effect to the policies or objectives proposed in the zone. It could also be seen as implying that development is generally appropriate in the aviation areas of the zone and this would not be appropriate in terms of providing certainty as to the application of Designation DAA1.
Option D: Private Plan Change policies, rules and precincts	Provides increased certainty to both the Airport Operator and the community as to development opportunities where these remain compatible with the role and function of a modern and contemporary Airport within the wider strategic growth and development of Nelson City. The use of Precincts provides greater clarity as to which parts of the Airport will be focused towards ‘working’ aspects of aviation, as associated with runway and taxiway infrastructure.

14.6.2 Airport Zone Framework Effectiveness and Efficiency

Effectiveness is the measure of contribution new provisions make towards achieving the objectives of the plan, and how successful they are likely to be in solving the problem they were designed to address¹⁵⁴.

The proposed rules each give effect to aspects of the policies (and therefore the objectives). The key aspects of the policies relate to; strategic development, activities in appropriate locations, activity scale and compatibility, and amenity.

Strategic development outcomes are provided for through ensuring appropriate activities are located in the right parts of the zone.

¹⁵⁴ Mfe.govt.nz Guide to Section 32 of the Resource Management Amendment Act, pg 18.

This is further reinforced by the rules relating to permitted activities (including limiting the scale and location of these). These rules are directly relevant to balancing the ability for new activities to occur in the zone with ensuring that such activities do not cause adverse effects on the environment or impact on the development of Nelson City.

The rules set parameters around what level of activity is appropriate within the zone.

There are a number of rules relating to amenity aspects of development (largely unchanged from the existing Industrial Zone plan provisions). In the same manner, regional rules as associated with earthworks and waterways are retained to ensure those values are provided for. Overall, the package of rules and methods is effective at achieving the objective for efficient use and development of the land, infrastructure and operational facilities at the Nelson Airport.

Efficiency is the measure of whether the provisions will be likely to achieve the objectives at the lowest total cost to all members of society, or achieves the highest net benefit to all of society¹⁵⁵.

The most efficient policy / method will achieve either of the following objectives:

- ~ the greatest benefit with the least cost;
- ~ the greatest 'amount of benefit' (e.g. highest level of amenity) relative to the level of cost, where the objective is not expressed as a fixed amount.

In essence the assessment of benefits and costs needs to consider both qualitative and quantitative attributes with a view to understanding what proposal is most efficient overall. A summary assessment of the costs and benefits of the proposed rules and methods is set out in Table 18 below.

Table 18: Efficiency of the Proposed Airport Zone Policies and Rules

Costs	Benefits
Economic	
<ul style="list-style-type: none"> ~ Costs associated with the Plan Change process. ~ Some transition of Industrial / Trade Supplier activities to the Airport Zone. 	<ul style="list-style-type: none"> ~ Supports ongoing development and growth of airport as an existing resource. ~ Increase in Airport competitiveness. ~ Efficient use of existing infrastructure. ~ Provides certainty and flexibility for future Airport operations and investment. ~ Enables additional employment opportunities within the zone. ~ Enables additional diversity in terms of the provision for business land opportunities, where this will not affect commercial centres.
Environmental	

¹⁵⁵ Mfe.govt.nz Guide to Section 32 of the Resource Management Amendment Act, pg 18.

Costs	Benefits
<ul style="list-style-type: none"> ~ Additional development density can lead to pressure on supporting infrastructure. ~ Zone interface with Designation DAA1 spatial extent results in changes in effects associated with that land utilised by the Nelson Golf Course. 	<ul style="list-style-type: none"> ~ Ensures appropriate management of amenity / visual adverse effects through retention and updating of rules relating to landscaping, setbacks, etc. ~ Ensures management of effects on natural values through retention and updating of rules relating to excavation, waterways and other regional rules. ~ Ensures avoidance of adverse effects by including restrictions on the type or extent of activities that could impact on the wider environment.
Social / Cultural	
<ul style="list-style-type: none"> ~ The proposed rules would provide for activities on that area of land currently zoned Open Space and Recreation Zone as occupied by the Nelson Golf Club (albeit Recreation Activities are also provided for). 	<ul style="list-style-type: none"> ~ The proposed rules would provide clarity and certainty around what is anticipated to occur within the Airport Zone. ~ The proposed rules would provide clarity and certainty around what levels of activity are expected in which parts of the zone. ~ The proposed precinct approach would clearly set out how the zone is intended to operate.

14.6.3 Amendments to Chapter 5

In summary (refer **Attachment A3** District Wide Provisions) the amendments relate to:

- ~ Amendments to Policy DO11.1.1 to recognise the contribution Nelson Airport makes in terms of economic and social wellbeing, and for Nelson Airport to be able to operate effectively and efficiently.
- ~ Amendment to Policy DO11.1.2 to provide clarity and a directive policy provision seeking to avoid incompatible development within the AECO and ANB;
- ~ Amendments to Policy DO11.1.3 seeking a reasonable balance between the operational needs of Nelson Airport and the wellbeing of the community, and to clarify the management responsibilities of Nelson Airport with regard to noise emissions from Aircraft Operations;
- ~ Minor amendments to Policy DO11.1.4 to reference the NMMP, as required by the Airport Operator;
- ~ Minor amendments to Policy DO15.1.1 to recognise the management hierarchy with regard to reverse sensitivity effects on nationally and regionally significant infrastructure as associated with infill development; and
- ~ Miscellaneous amendments to explanations and reasons to reflect the above.

The amendments are seen as being the **most appropriate** way to achieve the amended Objectives, in that they provide greater certainty as to the dual management regime enshrined into NZS6805:1992 as to the role of Nelson Airport in terms of managing aircraft operations and associated noise given that these effects cannot be fully internalised, and also responsibilities to the community to seek to avoid development that is incompatible with the efficient and effective operation of the airport by avoiding an increase in ASAN within the AECO and ANB.

The amendments are **effective**, in that they are more directive and hence certain in terms of the roles and responsibilities in terms of managing noise from Aircraft operations. They are also considered to be more **efficient** in terms of considering the costs and benefits compared to the approach of not regulating ASAN within the AECO and the ANB and the impacts on community and surrounding environment.

The approach follows the guidance provided by NZS6805:1992 as the appropriate assessment tool for managing noise exposure associated with Aircraft Operations, and the dual approach of recognising the functional activities associated with Nelson Airport and the Airport Operator's responsibilities in terms of compliance and management, and the need to avoid new ASAN within AECO and ANB.

14.6.4 Amendments to Zone Chapters – Residential, Industrial, Open Space and Recreation

In summary (refer **Attachment A4 – A11**) the amendments relate to:

- ~ ensuring a consistent approach to the treatment of ASAN seeking to establish within the AECO and ANB.

The approach seeks to provide for new ASAN within the AECO as a **non-complying** activity, and within the ANB as a **prohibited** activity.

The difference in consenting status is found within NZS6805 Table 1, and the increase in noise annoyance and potential health effects above the ANB as outlined in **Attachment K2**.

The replacement or substantial alteration of existing ASAN is provided for subject to compliance with the insulation and ventilation requirements in APP19 (which as modified by the PPC seek to insert contemporary measures as to appropriate requirements for acoustic insulation and ventilation as associated with noise from Aircraft Operations), or as confirmed by a qualified and experienced acoustic engineer to demonstrate that the building design will reduce aircraft noise levels to at least 40 dB L_{dn} inside the new habitable spaces based on the FANC in Appendix 19.1.

Furthermore:

- ~ in the Residential Zone, there is retention of provisions seeking to restrict an increase in dwelling density associated with allotments of less than 600m² within the AECO and ANB; and
- ~ a suite of provisions is also associated with the development and provision of additional buildings and facilities associated with Short Term Visitor Accommodation within the Tāhunanui Motor Camp as subject to OSz.2.1 as associated with the AECO and ANB.

The amendments are seen as being the **most appropriate** to achieve the amended Objectives in Chapter 5 – District Wide, in that they provide an integrated and consistent approach to the provision of ASAN within the AECO and ANB, and ensure that development remains compatible with Nelson Airport as nationally and regionally significant infrastructure.

The amendments are **effective**, in that they are more directive and hence certain in terms of avoiding additional ASAN within the AECO and ANB. They are also considered to be more **efficient** in terms of considering the costs and benefits compared to the approach of not regulating ASAN within the AECO and ANB and the associated reduction in amenity and the quality of the environment and impact on the wellbeing of the community.

15 Private Plan Change Conclusions

15.1.1 Are the proposed changes efficient and effective?

Based on the analysis undertaken above it is considered that the proposed changes within the PPC are both efficient and effective.

15.1.2 What are the risks of acting or not acting?

There is sufficient information that there are no risks around proceeding with this PPC.

The risks of not acting include:

- A disjunct between operative FANC and actual noise exposure.
- An absence of requirements for mitigation leading to higher levels of community annoyance at Aircraft Operations.
- The management of ASAN will continue to be unaligned with NZS6805.
- An unaligned approach between the importance of Nelson Airport and Aircraft Operations and wider District Wide provisions associated avoiding reverse sensitivity effects on nationally and regionally significant infrastructure and implications for urban form and growth.

15.1.3 Does the Plan Change better achieve the purpose of the RMA?

Overall, it is considered that the PPC will better achieve the sustainable management purpose of the RMA than either the present situation or any alternative approaches examined.

Having assessed the proposed PPC against all the requirements under the RMA, it is considered that the proposed changes to the NRMP would meet the sustainable management purpose of the Act.

The PPC would better meet the objectives of the NRMP for the recognition, management and protection of airport activities and operations, including an appropriate and consistent approach to the management of ASAN.

The approach provides clarity and certainty to both NAL and the broader community around intentions for future use and development, and commensurate management of effects on the environment.

16 Part 2 Assessment

16.1.1 Part 2 - Purpose and Principles

As set out above (and for completeness) an assessment of the NoR and the PPC against relevant matters of the purpose and principles in Part 2 of the RMA (Table 1) is appropriate. Sections 5 to 8 make up Part 2.

Section	Content
Section 5 (Purpose)	<p>States the purpose of the RMA, being to promote the sustainable management of natural and physical resources, and sets out what sustainable management means as follows:</p> <ol style="list-style-type: none"> (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while— <ol style="list-style-type: none"> (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)	<p>In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance:</p> <ol style="list-style-type: none"> (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: (b) the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development: (c) the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna: (d) the maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers: (e) the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga: (f) the protection of historic heritage from inappropriate subdivision, use, and development:

	(g) ... (h) the management of significant risks from natural hazards.
Section 7 (Other matters)	In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to— (a) kaitiakitanga: (aa) ...: (b) the efficient use and development of natural and physical resources: (ba) the efficiency of the end use of energy: (c) the maintenance and enhancement of amenity values: (d) intrinsic values of ecosystems: (e) ... (f) maintenance and enhancement of the quality of the environment: (g) any finite characteristics of natural and physical resources: (h) ...: (i) the effects of climate change: (j) the benefits to be derived from the use and development of renewable energy.
Section 8 (Treaty of Waitangi)	In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).

Table 19 – Part 2 of the RMA

16.1.2 Section 5

Section 5 which sets the purpose of the RMA to promote the sustainable management of natural and physical resources is in two parts, the first – regarded as an enabling provision for resources to be used in a way (and at a rate) that enables people and communities to provide for their economic, social and cultural wellbeing and for their health and safety. The second part contains three limbs, as related to the values of resources and management of effects on the environment.

In terms of the enabling part of Section 5, the NoR to enable an extension to NAL's existing main runway will improve the efficiency and effectiveness of operations at the existing Nelson Airport, which is a significant physical resource that contributes meaningfully to the social, economic and cultural wellbeing of people and communities in the Nelson Region¹⁵⁶.

¹⁵⁶ Attachment L. Martin Jenkins [Table 3 and Table 4].

With regard to the three limbs in s5(2):

- The NoR will help sustain the operations and effectiveness of Nelson Airport as a physical resource to meet the reasonably foreseeable needs of future generations. This includes that the current runway length and absence of RESA may preclude economic operations associated with more sustainable aircraft types.¹⁵⁷.
- The proposal, as subject to the Proposed Conditions and relevant regional consents will not have any adverse effect on the life supporting capacity of air, water, soil and ecosystems. The site has connections to all relevant infrastructure services, and changes to permeable surfaces and runoff requiring additional stormwater discharge consents is managed under the regional provisions of the NRMP.
- Any adverse environmental effects, particularly those associated with landscape¹⁵⁸ and noise¹⁵⁹ are able to be avoided, remedied or mitigated to an acceptable degree through the Proposed Conditions and PPC provisions.

16.1.3 Section 6

In terms of **Section 6(a) and (b)**, the assessment from Boffa Miskell¹⁶⁰ identifies that:

- There are no outstanding natural landscapes or features present.
- Any adverse effects on the natural character of the coastal environment will be low given the high levels of modifications already present and ability to absorb development facilitated by the NoR. The northern runway extension area consists of a relatively modified terrestrial landscape associated with the golf course which has been highly modified through landscape sculpting and exotic grasslands.

In terms of **Section 6(c)**, the assessment from Boffa Miskell¹⁶¹ identifies that:

- Minor adverse effects expected, due to loss of 0.17 ha of indigenous dominated saltmarsh vegetation along Maire Stream tributary. This area of indigenous dominated saltmarsh vegetation along Maire Stream tributary is of moderate ecological value; all other vegetation and terrestrial habitats within the northern extension are of negligible ecological value.
- The piping or infilling of Maire Stream tributary will result in the loss of c.400 m of freshwater habitat (which is c.10% of the coastal stream reaches in the Waimea Inlet area around the airport), the associated loss of potential inanga spawning habitat, and an increase in impervious surfaces and contaminant inputs would equate to a Moderate magnitude of effect. Where avoidance is not practicable, a clear approach

¹⁵⁷ Attachment G. Airbiz [3.ii].

¹⁵⁸ Attachment J2. Boffa Miskell [8].

¹⁵⁹ Attachment K2. Marshall Day Acoustics [13].

¹⁶⁰ Attachment J1. Boffa Miskell – Landscape [5.1 and 6.1.1].

¹⁶¹ Attachment H2. Boffa Miskell – EclA [pg 4 and 5].

will be needed to manage the adverse effects on the ecology, using the effects management hierarchy through the regional consenting process.

- The magnitude of effect on avifauna is considered negligible at the scale of the Waimea inlet. However, given terrestrial avifauna that may be present, the Proposed Conditions affixed to the NoR seek to manage the effects of works as part of the Outline Plan process.

Regarding **Section 6(d)**, the assessment from Boffa Miskell¹⁶² identifies that if the Airport chooses to retain the Airport Perimeter Walk, the Walk would need to be realigned along the northern extent of the designation to enable a 'loop' track and provide for recreational access. The Great Taste Trail is currently being constructed and extends along the proposed eastern designation boundary. NAL currently facilitates existing access to the CMA within its landholdings. There are opportunities to maintain public access to and along the CMA through the design and construction of the northern runway extension.

In terms of **Section 6(e)**, initial consultation and engagement has been on-going since April 2022 as set out above. In April 2022, NAL submitted a consultation paper to the Te Waka a Māui Iwi Chairs Forum on the runway extension, zoning, proposed aircraft noise contours and the noise mitigation package and sent an information pack on the runway extension and associated information to the Environmental Managers of Ngāti Apa ki te Rā Tō, Ngāti Koata, Ngāti Kuia, Ngāti Rārua, Ngāti Tama, Ngāti Toa Rangatirea, Ngāti Rangitāne, and Te Ātiawa. On 13 June 2022, NAL met with the Iwi Chairs' Forum to discuss the consultation paper submitted in April and provide the various Iwi representatives with the opportunity to provide feedback.

Ongoing engagement will occur to ensure appropriate cultural inputs and values are reflected in detailed design and project construction. Notwithstanding this, the runway extension area itself is not identified in the NRMP as one possessing specific cultural or historic heritage values or features. The Archaeological and Heritage Assessment identifies that the coastal area of the Waimea Inlet was of great importance to local Māori as means of both transport and mahinga kai, and that north of the Site in Tāhunanui, one of the oldest camps was located near the junction of what is today Bisley Avenue and Rocks Road¹⁶³.

In terms of **Section 6(f)**, the assessment from Underground Overground¹⁶⁴ identifies that there is low potential for pre-1900 archaeological sites to be present in this area, and it is likely that any sites that do remain are likely to be in a disturbed state, there are also historic heritage values associated with the use of the extended Designation DAA1 as an WWII Airforce base. Proposed Conditions are affixed to the NoR to ensure appropriate management, in addition to requirements under the Heritage New Zealand Pouhere Taonga Act 2014.

Regarding **Section 6(h)**, the assessment from Stantec¹⁶⁵ identifies that the hazards associated with the Site are well understood (Nelson airport is in an area of high seismicity although

¹⁶² **Attachment J2.** Boffa Miskell – Landscape [6.3.1.1].

¹⁶³ **Attachment G1.** Underground Overground [5].

¹⁶⁴ **Attachment G2.** Underground Overground [pg 3].

¹⁶⁵ **Attachment I1.** Stantec [Section 3].

there are no active faults with the Site extending into the Tāhunanui Liquefaction Study area, as well as being located within the Civil Defence Tsunami Evacuation Zones). The NoR does not exacerbate the risk of natural hazards to people and communities. In terms of adverse effects associated with Geotech and Flood hazard, these effects can be avoided, remedied or mitigated through detailed design and subsequent regional consenting pathways¹⁶⁶.

16.1.4 Section 7

Regarding **Section 7(a)** works undertaken pursuant to s176A and associated construction processes will include appropriate oversight by dedicated kaitiaki (the principles of kaitiakitanga). Conditions recommended to Designation DAA1 (DAA1.4.iii) also incorporate a requirement for the Airport Operator to engage a suitably qualified archaeologist to prepare an archaeological and heritage management plan (**AHMP**) as associated with the northern runway extension. The AHMP includes requirements for measures, protocols and consultation with representative tāngata whenua associated with accidental discovery of cultural sites, kōiwi or taonga during construction works.

In terms of **Section 7(b)** and **(g)** Nelson Airport represents a finite physical resource, that is not able to be easily relocated. Its location as central to both Nelson City and Richmond contributes to the efficient transport patterns of the Region, and wider connectivity to New Zealand. The NoR to provide for the northern runway extension promotes the efficient use and development of the Airport as a physical resource in terms of resilience and improving safety associated with the use of Airport infrastructure to meet the needs of current and future generations¹⁶⁷.

The values associated with Maire Stream tributary represent a physical resource in terms of **Section 7(g)** and also intrinsic values in terms of **Section 7(d)**. The effects on those values will be managed through detailed design and the future regional consenting process. The assessments for Ecology¹⁶⁸, Geotech¹⁶⁹ and Landscape¹⁷⁰ do not identify any substantial impediments that would not be able to be overcome through detailed design and the management of adverse effects.

With regard to **Section 7(c)** and **Section 7(f)** the effects associated construction and operation of the northern runway extension will be able to be managed appropriately, as set out in **Attachment K2** and **Attachment J2** relating to Noise and Landscape respectively. As identified, landscape character and values associated with the NoR and associated zoning can be appropriately absorbed into the receiving environment, as subject to Proposed Conditions and the s176A process for works.

¹⁶⁶ **Attachment I2.** Stantec [pg 2].

¹⁶⁷ **Attachment M.** Airbiz [3.ii].

¹⁶⁸ **Attachment H2.** Boffa Miskell.

¹⁶⁹ **Attachment I2.** Stantec.

¹⁷⁰ **Attachment J2.** Boffa Miskell.

Whilst there will be an increase in noise levels experienced by a limited number of residential properties, the extent of exposure and number of residential units impacted are not markedly different from those anticipated and provided for within the operative NRMP. In addition, there are a range of Proposed Conditions within DAA2 that seek to manage aircraft noise, as well as requirements for insulation and / or ventilation, a NMMP and reporting and compliance with the ANB. Accordingly, the effects on amenity values and the quality of the environment are managed to an acceptable degree.

In terms of the effects of climate change (section 7(i)) (which is concerned with matters such as increased storm events and sea level rise, the assessment from Stantec identifies that the NoR has no effects on coastal risk and processes, and adverse effects associated with flooding and stormwater can be avoided, remedied or mitigated through detailed design and subsequent regional consenting pathways.¹⁷¹

16.1.5 Section 8

The principles of the Treaty of Waitangi have been taken into account, noting that the site is within a developing urban environment, there are no known sites of cultural significance (based on available planning documents), and ongoing engagement with mana whenua will take place.

16.1.6 Conclusion Part 2

Overall, it is considered that there are no aspects of Part 2 that weigh against the decision to confirm the NoR and PPC.

The proposed NoR and PPC will ensure that Nelson Airport is able to meet the needs of current and future generations through providing an ability to respond quickly to changes in the aviation sector towards future sustainable aircraft and improve the safety and resilience of Airport infrastructure and operations.

The health and safety of the community will be enhanced through enabling NAL to remove existing operational constraints associated with the current runway length and be able to facilitate the provision of RESA to achieve compliance with aviation regulations. The NoR will also provide certainty to the surrounding community that aircraft operational noise will be managed and monitored appropriately.

The NoR with the designation is part of an urban environment and has been substantially modified through human activity. Proposed Conditions affixed to the designation, in addition to requirements for an Outline Plan, will ensure that adverse effects, including those on historic heritage, and ecology and landscape values associated with the Maire Stream tributary can be appropriately avoided, remedied or mitigated.

¹⁷¹ Attachment I2. Stantec (pg 3)