

Proposed Natural Resources Plan:

Submitter:

Kapiti Coast Airport Holdings Limited

Submitter Number:

S99

25 SEP 2015

Submission

ON A PUBLICLY NOTIFIED PROPOSED POLICY STATEMENT OR PLAN



Under Clause 6 of the First Schedule to the Resource Management Act 1991

TO Greater Wellington Regional Council (the 'Council')

SUBMISSION ON The Proposed Natural Resources Plan for the Wellington Region 2015 (the 'Proposed Plan')

NAME OF SUBMITTER Kapiti Coast Airport Holdings Limited ('KCAHL')

INTRODUCTION

Kapiti Coast Airport Holdings Limited ('KCAHL') makes the following submissions on the Proposed Natural Resources Plan for the Wellington Region 2015 (the 'Proposed Plan').

KCAHL is the owner of Kapiti Coast Airport (the 'Airport'). The Airport is a significant resource for both aviation and non-aviation activities for the Wellington Region and is strategically important for the economic growth, development and well-being of Kapiti District and its residents.

The Airport site consists of the following certificates of title and legal descriptions listed in Table 1 below.

TABLE 1: LEGAL DESCRIPTION OF KAPITI COAST AIRPORT

CERTIFICATE OF TITLE	LEGAL DESCRIPTION
WN53D/165	Part Ngarara West B5 Block, Part Ngarara West B7, 1 Block, Part Ngarara West B7, 2A Block and Part Ngarara West B7, 2B Block
WN46C/570	Part Ngarara West B4 Block
WN46C/569	Part Ngarara West B4 Block and Defined on Survey Office Plan 20377
WN46C/576	Part Ngarara West B4 Block
WN46C/574	Part Lot 1 Block IV Deposited Plan 2767
WN46C/575	Part Lot 3 Block IV Deposited Plan 2767 and Lot 1, Lot 3, Lot 5 and Part Lot 7 Deposited Plan 13859

The Airport is of regional significance as Kapiti District shares boundaries with six other District Councils. The Airport represents a significant part of District and Regional transport infrastructure.

KCAHL's submission on the Proposed Plan can be broken down into the following topics:

- Classification of Wharemauku Stream and its Tributaries;
- Objectives, policies and rules relating to:
 - Mana Whenua values;
 - Regionally Significant Infrastructure;
 - Habitats with significant indigenous ecosystems;
 - Natural wetlands;
 - Stormwater; and
 - Earthworks.
- Interpretation of Regionally Significant Infrastructure; and
- Identification of Kapiti Coast Airport on the Planning Maps.

KCAHL could not gain an advantage in trade competition through this submission.

OVERALL SUBMISSION

1.0 CLASSIFICATION OF WHAREMAUKU STREAM AND ITS TRIBUTARIES

KCAHL **opposes** the inclusion of the tributaries of the Wharemauku Stream that is located within the Airport site as a river of significant ecological value in Schedule F1 of the Proposed Plan.

The Proposed Plan incorrectly identifies rivers on the Airport site as containing significant indigenous biodiversity values. Although the Wharemauku Stream and its tributaries that are located on the Airport have some ecological value, it is considered that these values are low to moderate as assessed by appropriately qualified ecologists previously engaged in providing advice and assessments on the Stage 1 and Stage 2 Airport development applications made to Greater Wellington Regional Council. The *King Salmon*¹ decision highlights the need to be careful in both mapping and defining of characteristics / values and precise locations of each area that requires protection.

Due to the inclusion of the tributaries of the Wharemauku Stream in Schedule F1, KCAHL are subject to stringent objectives, policies and rules contained in the Proposed Plan. The applicability of these objectives, policies and rules of the Proposed Plan provide an extremely high threshold for environmental protection which may undermine the effective operation, maintenance, use and development of the Airport that represents a significant part of District and Regional transport infrastructure.

The wording of the objectives and policies relating to Schedule F1 rivers implies that greater weight be provided to environmental protection and avoidance of all adverse effects when compared to those addressing the benefits of activities and the benefits of the use, development and maintenance of Regionally Significant Infrastructure ('RSI').

It is considered that there is no sound or balanced resource management justification to include the Wharemauku Stream and its tributaries on the Airport in Schedule F1.

1.1 RELIEF SOUGHT

KCAHL seeks the following decision from the Council:

- 1.1.1 Amend the row relating to Wharemauku Stream in the table of Schedule F1 'Rivers and lakes with significant indigenous ecosystems' in the Proposed Plan to exclude Kapiti Coast Airport as follows (deletions in strikethrough, amendments underlined):

Wharemauku Stream		Stream and all tributaries, located on the site of Kapiti Coast Airport <u>excluding those located on the site of Kapiti Coast Airport</u>	Stream and all tributaries, located on the site of Kapiti Coast Airport <u>excluding those located on the site of Kapiti Coast Airport</u>		Banded kokopu, koaro, longfin eel, redfin bully, shortfin eel and shortjaw kokopu
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AND

- 1.1.2 Delete any reference to streams identified as Schedule F1 from the Maps of the Proposed Plan affecting the site of the Kapiti Coast Airport.

AND

- 1.1.3 Such other additional or consequential relief as is necessary to achieve consistency with the above and to satisfy the concerns of KCAHL, including amendments to the objectives and policies.

¹ *Environmental Defence Society Inc v New Zealand King Salmon Company Limited*

2.0 MANA WHENUA VALUES

KCAHL **opposes** the inclusion of the Wharemauku Stream on the Airport as a site with significant mana whenua values in Schedule C. Specifically, Wharemauku Stream is identified in Schedule C2 as a site of significance to Te Atiawa ki Whakarongotai.

KCAHL does not oppose the fact that Wharemauku Stream is identified as having mana whenua values; however, it opposes the uncertainty in the Proposed Plan over what is deemed to be the site affected by mana whenua values and the implications this may have given the proposed objectives, policies and rules relating to these sites. For example, Policy 45 requires the avoidance of activities in sites of significance in the first instance and if they can't be avoided, then more than minor effects must be evaluated through a cultural impact assessment ('CIA') undertaken by the relevant iwi authority or authorities. The effects are then to be managed in accordance with tikanga and kaupapa maori as recommended in the CIA to, amongst other things, avoid more than minor adverse effects. In the case of RSI, and indeed other forms of development, that may not be practicable or appropriate overall. Furthermore, any recommendation in a CIA needs to be assessed by Council in its regulatory role as part of an application rather than necessarily adopted. Similarly, Policy P138 'Structures in sites with significant values' requires new or replacement structures or alterations in these areas to be avoided, except in certain circumstances. These circumstances do not include the provision of, or recognise the requirements of, RSI.

The term 'site' is not defined in the Proposed Plan, and while it is assumed that the area of the site that holds mana whenua values is restricted to the identified streams in Schedule C and their margins, there is uncertainty as to how this will be interpreted when implementing the rules relating to Schedule C2 sites contained in the Proposed Plan.

This uncertainty in interpretation of 'site' for mana whenua values has the potential to impose stringent objectives, policies and rules on the Airport with no clear resource management purpose.

2.1 RELIEF SOUGHT

KCAHL seeks the following decision from the Council:

- 2.1.1 Amend the preamble of Schedule C 'Sites with significant mana whenua values' to define and clarify what constitutes the 'site' for each place/waterbody.

OR

Confirm that the site identified by 'Wharemauku Stream – East' and/or 'Wharemauku Stream – West' in Schedule C2 of the Proposed Plan is limited to the stream only and not the surrounding land of the Airport.

AND

- 2.1.2 Amend the objectives, policies and rules in the Proposed Plan that relate to sites with significant mana whenua values to ensure that they are appropriately balanced with relevant consideration of, including the efficient provisions of, regionally significant infrastructure and related development.

AND

- 2.1.3 Amend the Maps of the Proposed Plan to accurately identify the location of 'sites' with significant mana whenua values.

AND

- 2.1.4 Such other additional or consequential relief as is necessary to achieve consistency with the above and to satisfy the concerns of the KCAHL.

3.0 REGIONALLY SIGNIFICANT INFRASTRUCTURE

KCAHL **supports** the inclusion of the Kapiti Coast Airport as Regionally Significant Infrastructure ('RSI') in the policy framework of the Proposed Plan and the recognition of the Airport in policy P135 (Safe passage for Aircraft), policy P137 (Airport height restriction areas), rule 159 (Structures in airport height restriction areas). However, KCAHL **opposes** the particular wording of many of the objectives, policies and status of rules that seek to manage RSI and the effects of such infrastructure.

The wording of the policy framework to 'provide for' and 'enable' RSI is not as directive as the objectives, policies and rules that are applicable to the protection and avoidance of all adverse environmental effects on lakes and rivers. One outcome of the *King Salmon* decision is a clear move away from an overall judgement approach to the implementation of provisions in higher order documents when giving effect to them. The decision also clarified that policies expressed in directive terms carry greater weight than those expressed in less directive terms (i.e. 'avoid' is stronger than 'recognise').

Under the current policy framework of the Proposed Plan, when assessing an application for works associated with the use, operation, maintenance or development of RSI, the Council would be required to give greater weight to the strong directive terminology of objectives and policies that protect certain aspects of the environment, rather than those that enable and recognise RSI.

It is therefore considered important that the policy framework of the Proposed Plan takes a more balanced resource management approach and provides more directive wording to the objectives, policies and rules that apply to RSI. This would recognise the important role that RSI, including the Airport, has on the economic growth, development and well-being of residents in the Wellington Region.

The wording of the objectives, policies and rules for RSI in the Proposed Plan are inconsistent with the Regional Policy Statement for the Wellington region 2013 (the RPS).

Objective 10 of the RPS states:

'The social, economic, cultural and environmental benefits of regionally significant infrastructure are recognised and protected.'

Policy 8 of the RPS states:

'Protecting regionally significant infrastructure – regional and district plans'

The protection of RSI is therefore supported by RPS objectives and policies that are to be implemented in regional and district plans. However, many of the objectives and policies of the Proposed Plan seek only to recognise RSI, not protect it. It is therefore considered that the policy framework of Proposed Plan inconsistent with the RPS and needs to be amended to protect RSI.

It is also considered important that the rules of the Proposed Plan recognise the importance of RSI by applying a less restrictive activity status to activities associated with the use, operation, development and maintenance of RSI. A controlled activity status would reflect and be consistent with the objectives and policies of the Proposed Plan and RPS that relate to RSI, whilst still appropriately managing the effects of RSI on less significant habitats and ecosystems. However, it is considered appropriate to apply a more stringent activity status, such as discretionary, to manage the effects of RSI activities that are undertaken within sites of significance that are identified in the Schedules of the Proposed Plan.

3.1 RELIEF SOUGHT

KCAHL seeks the following decision from the Council:

- 3.1.1 Amend Objective O12 in Section 3.2 of the Proposed Plan as follows (deletions in strikethrough, amendments underlined):

'Objective O12

The social, economic, cultural and environmental benefits of regionally significant infrastructure and renewable energy generation activities are ~~recognised~~ enabled.'

AND

- 3.1.2 Retain Objective O13 in Section 3.2 of the Proposed Plan as notified without modification.

AND

3.1.3 Amend Policy P12 in Section 4.2 of the Proposed Plan as follows (deletions in strikethrough, amendments underlined):

'Policy P12: Benefits of regionally significant infrastructure and renewable electricity generation facilities

The benefits of regionally significant infrastructure and renewable energy generation activities are recognised enabled by ~~having regard to~~ consideration of:

(a) the strategic integration of infrastructure and land use, and

(b) the location of existing infrastructure and structures, and

(c) the need for renewable energy generation activities to locate where the renewable energy resources exist, and

(d) the functional need for port activities to be located within the coastal marine area, and

(e) operational requirements associated with developing, operating, maintaining and upgrading regionally significant infrastructure and renewable energy generation activities.'

AND

3.1.4 Amend Policy P13 in Section 4.2 of the Proposed Plan as follows (deletions in strikethrough, amendments underlined):

'Policy P13: Existing regionally significant infrastructure and renewable electricity generation facilities

The use, operation, maintenance, and upgrade of existing regionally significant infrastructure and renewable energy generation activities are beneficial and generally appropriate.'

AND

3.1.5 Retain Policy P14 in Section 4.2 of the Proposed Plan as notified without modification.

AND

3.1.6 Amend Policy P102 in Section 4.8.12 of the Proposed Plan as follows (deletions in strikethrough, amendments underlined):

'Policy P102: Reclamation or drainage of the beds of lakes and rivers

The reclamation or drainage of the beds of lakes and rivers and natural wetlands (including those listed in the Schedules of this Plan) shall be avoided except where the reclamation or drainage is:

(a) partial reclamation of a river bank for the purposes of flood prevention or erosion control, or

(b) associated with a qualifying development within a special housing area, or

(c) associated with a growth and/or development framework or strategy approved by a local authority under the Local Government Act 2002, or

(d) necessary to enable the development, operation, maintenance and upgrade of regionally significant infrastructure, or

(e) associated with the creation of a new river bed and does not involve piping of the river, and

(f) in respect of (a) to (e) there are no other reasonable or practicable alternative methods of providing for the activity, or

(g) the reclamation or drainage is of an ephemeral flow path.

For the purpose of this policy the piping or covering of a stream for a distance greater than that required to form a reasonable crossing point is considered to be reclamation of the river bed.'

AND

3.1.7 Include a new Rule R106a in Section 5.5 'Wetlands and beds of lakes and rivers' to provide for activities associated with RSI to be considered as controlled activities when they are undertaken in natural wetlands, but not in wetlands identified as significant natural wetlands or outstanding natural wetlands. Include new Rule R106a in Section 5.5 as follows (deletions in strikethrough, amendments underlined):

'Rule R106a: Activities of regionally significant infrastructure outside sites of significance – controlled

Activities of regionally significant infrastructure located outside any outstanding natural wetland identified in Schedule A3 ('Wetlands with outstanding indigenous biodiversity values') or any significant natural wetland identified by Schedule F3 ('Identified significant wetlands') is a controlled activity.'

AND

Include new and appropriate 'Matters of control' for Rule R106a relating to regionally significant infrastructure.

AND

Amend the activity table at the start of Section 5.5 'Wetlands and beds of lakes and rivers' by inserting a new row as follows (deletions in strikethrough, amendments underlined):

.....

Rules – Wetlands and beds of lakes and rivers	Page	P	C	RD	D	NC	Pr
<u>Rule R106a: Activities of regionally significant infrastructure outside sites of significance</u>	<u>160</u>		● —				

.....

AND

3.1.8 Retain Policy P135 in Section 4.10.1 of the Proposed Plan as notified without modification.

AND

3.1.9 Retain Policy P137 in Section 4.10.1 of the Proposed Plan as notified without modification.

AND

3.1.10 Retain Rule P159 in Section 5.7.5 of the Proposed Plan as notified without modification.

AND

3.1.11 Amend Rule 214 in Section 5.7.18 of the Proposed Plan as follows (deletions in strikethrough, amendments underlined):

'Rule R214: Reclamation and drainage for regionally significant infrastructure outside of sites of significance – ~~discretionary controlled~~

Reclamation and drainage for regionally significant infrastructure activities outside a site or habitat identified in Schedule C (mana whenua), Schedule E4 (archaeological sites), Schedule F4 (coastal sites), Schedule F5 (coastal habitats) or Schedule J (geological features) in the coastal marine area, including any associated:

- (a) occupation of space in the common marine and coastal area, and*
- (b) destruction of the foreshore or seabed, and*
- (c) disturbance of the foreshore or seabed, and*
- (d) deposition in, on or under the foreshore or seabed, and*
- (e) discharge of contaminants, and*
- (f) diversion of open coastal water*

is a controlled ~~discretionary~~ activity.'

AND

Include appropriate 'Matters of control' for Rule R214.

AND

Amend the activity table at the start of Section 5.7 'Coastal management' by changing the activity status in the row relating to Rule R214 as follows (deletions in strikethrough, amendments underlined):

.....

Rules – Coastal management (CM)	Page	P	C	RD	D	NC	Pr
<u>Rule R214: Reclamation and drainage for regionally significant infrastructure outside sites of significance</u>	<u>235</u>		● —		●		

.....

AND

3.1.12 Such other additional or consequential relief as is necessary to achieve consistency with the above and to satisfy the concerns of the KCAHL.

4.0 HABITATS WITH SIGNIFICANT INDIGENOUS ECOSYSTEMS AND NATURAL WETLANDS

KCAHL recognises the need for the Proposed Plan to have a policy framework that provides appropriate for the appropriate protection and management of habitats that that have significant indigenous ecosystems. However, KCAHL **opposes** the wording of some objectives and policies that seek to manage the effects of activities on such habitats. In particular, the wording of some objectives and policies have the potential to create uncertainty in their implementation as they use terminology that is not consistent with other documents prepared under the Resource Management Act 1991 (the 'RMA').

The objectives and policies of the Proposed Plan place too much focus on the natural environment and do not appropriately recognise that urban activity is also part of the environment. The wording of some objectives and policies implies that activities themselves are inappropriate, not the potential effects that they may create.

4.1 RELIEF SOUGHT

KCAHL seeks the following decision from the Council:

- 4.1.1 Amend Objective O22 in Section 3.4 as follows (deletions in strikethrough, amendments underlined):

'Objective O22

Hard engineering mitigation and protection methods ~~are only used as a last~~ can be used as part of the best practicable option.

AND

- 4.1.2 Amend Policy P4 in Section 4.1 as follows (deletions in strikethrough, amendments underlined):

'Policy P4: Minimising adverse effects

Where ~~minimisation of adverse effects is required by policies in the Plan, minimisation means reducing~~ minimisation of adverse effects of the activity to the smallest amount practicable and shall include ~~may include:~~

(a) consideration of alternative locations and methods for undertaking the activity that would have less adverse effects, and

(b) locating the activity away from areas identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule E (historic heritage), Schedule F (indigenous biodiversity), and

(c) timing the activity, or the adverse effects of the activity, to avoid times of the year when adverse effects may be more severe, or times when receiving environments are more sensitive to adverse effects, and

(d) using good management practices for reducing the adverse effects of the activity, and

(e) designing the activity so that the scale or footprint of the activity is ~~as small as practicable~~ appropriately reduced.

AND

- 4.1.3 Amend Policy P41 in Section 4.1 by deleting the last paragraph as follows (deletions in strikethrough, amendments underlined):

'.....

Where ~~more than minor adverse effects on ecosystems and habitats with significant indigenous biodiversity values identified in Policy P40 cannot be avoided, remedied, mitigated or redressed through biodiversity offsets, the activity is inappropriate.~~

.....'

OR

Amend the last paragraph of Policy P41 in Section 4.1 as follows (deletions in strikethrough, amendments underlined):

'.....

Where more than minor adverse effects on ecosystems and habitats with significant indigenous biodiversity values identified in Policy P40 cannot be avoided, remedied, mitigated or redressed through biodiversity offsets, the effects of the activity is ~~are~~ inappropriate.

.....'

AND

- 4.1.4 Such other additional or consequential relief as is necessary to achieve consistency with the above and to satisfy the concerns of the KCAHL.

5.0 STORMWATER

Policy P78 provides for the management of stormwater on larger sites such as the Airport. This policy is **supported** to the extent that it recognises that discharges from these sites are managed to minimise adverse effects and implement good management practice, while recognising that improved management may need to be introduced progressively and over time.

However, KCAHL **opposes** the inconsistency created by the stormwater discharge rules in the Proposed Plan. Specifically, stormwater discharges from an individual property (which has no area threshold) is permitted under Rules R48 and R49. Conversely, stormwater discharges from Airports are assessed as a restricted discretionary activity under Rule R52, regardless of whether they can demonstrate compliance with the same standards that apply to an individual property under Rules R48 and R49.

There is no resource management justification for the Proposed Plan to create inconsistency between how various activities are regulated. RSI, such as the Airport, should be afforded the same activity status as activities on individual properties if they can satisfy the same standards that manage the environmental effects of stormwater discharge. It would therefore be an appropriate resource management response to include RSI as permitted activities in Rules R48 and R49, and to remove Rule R52 from the Proposed Plan. This would recognise, and be consistent with, the policy framework of the Proposed Plan and the RPS by enabling the effective operation, use and maintenance of RSI.

KCAHL **opposes** Rule R67 of the Proposed Plan that applies a non-complying activity status on stormwater discharges within sites of significance even though the activity complies with the permitted standards in Rules R48 and R49. It is also considered inappropriate to apply a blanket non-complying activity status for any discharge in a site of significance. Rule R67 does not promote a balanced resource management approach and it does not acknowledge the strategic importance of RSI for the economic growth, development and well-being of residents in the Wellington Region

5.1 RELIEF SOUGHT

KCAHL seeks the following decision from the Council:

- 5.1.1 Retain Policy P78 in Section 4.8.3 of the Proposed Plan as notified without modification.

AND

- 5.1.2 Amend Rule R48 in Section 5.2.3 'Stormwater' of the Proposed Plan as follows (deletions in strikethrough, amendments underlined):

'Rule R48: Stormwater from an individual property – permitted activity

The discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, from an individual property (including any property that contains regionally significant infrastructure) is a permitted activity, provided the following conditions are met:

.....'

AND

- 5.1.3 Amend Rule R49 in Section 5.2.3 'Stormwater' of the Proposed Plan as follows (deletions in strikethrough, amendments underlined):

'Rule R49: Stormwater to land – permitted activity

The discharge of stormwater onto or into land, including where contaminants may enter groundwater, from an individual property (including any property that contains regionally significant infrastructure) is a permitted activity provided the following conditions are met:

.....'

AND

5.1.4 Delete Rule R52 'Stormwater from large sites – restricted discretionary activity' in Section 5.2.3 of the Proposed Plan in its entirety as follows (deletions in strikethrough, amendments underlined):

~~'Rule R52: Stormwater from large sites – restricted discretionary activity~~

~~The discharge of stormwater into water, or onto or into land where it may enter water, from a port, airport or state highway is a restricted discretionary activity.~~

~~Matters for discretion~~

- ~~1. The management of the adverse effects of stormwater capture and discharge, including cumulative effects, of stormwater on aquatic ecosystem health and mahinga kai, contact recreation and Māori customary use~~
- ~~2. The management of effects on sites identified in Schedule A (outstanding water bodies), Schedule B (Ngā Taonga Nui a Kiwa), Schedule C (mana whenua), Schedule F (indigenous biodiversity)~~
- ~~3. Minimisation of the adverse effects of stormwater discharges through progressive improvement over time'~~

AND

Amend the activity table at the start of Section 5.2 'Discharges to water' by deleting the row relating to Rule R52 as follows (deletions in strikethrough, amendments underlined):

.....

Rules – Stormwater	Page	P	C	RD	D	NC	Pr
Rule R52: Stormwater from large sites	121			●			

.....'

AND

5.1.5 Amend Rule R67 in Section 5.2.8 'All other discharges' in the Proposed Plan as follows (deletions in strikethrough, amendments underlined):

~~'Rule R67: Discharges inside sites of significance – non-complying activity~~

~~The discharge of water or contaminants into water, or onto or into land where it may enter water:~~

- ~~(a) inside a site or habitat identified in Schedule A (outstanding water bodies), Schedule F1 (rivers/lakes), Schedule F3 (significant wetland), or Schedule F4 (coastal sites), and~~
- ~~(b) that is not permitted by Rules R42, R43, R44, ~~or R45, R48 or R49~~~~

~~is a non-complying activity.'~~

AND

5.1.6 Such other additional or consequential relief as is necessary to achieve consistency with the above and to satisfy the concerns of the KCAHL.

6.0 EARTHWORKS

KCAHL generally **supports** Rule R99 'Earthworks and vegetation clearance – permitted' and Rule R101 'Earthworks and vegetation clearance – discretionary'. The earthworks threshold of a contiguous area of 3,000m² per property per 12 month period is considered to be appropriate to effectively manage the effects of earthworks.

6.1 RELIEF SOUGHT

KCAHL seeks the following decision from the Council:

6.1.1 Retain Rule P99 'Earthworks and vegetation clearance – permitted' in Section 5.4.4 of the Proposed Plan as notified without modification.

AND

6.1.2 Retain Rule 'Earthworks and vegetation clearance – discretionary' in Section 5.4.4 of the Proposed Plan as notified without modification.

AND

6.1.3 Such other additional or consequential relief as is necessary to achieve consistency with the above and to satisfy the concerns of the KCAHL.

7.0 INTERPRETATION OF REGIONALLY SIGNIFICANT INFRASTRUCTURE

KCAHL **supports** the definition of Regionally Significant Infrastructure ('RSI') as this definition includes Paraparaumu Airport. However, when the Airport changed ownership in 2011 the name of the Airport was changed from Paraparaumu Airport to Kapiti Coast Airport.

The definition of RSI therefore needs to be amended to accurately reflect the new name of the Airport.

7.1 RELIEF SOUGHT

KCAHL **seeks the following decision from the Council:**

7.1.1 Amend the definition of 'Regionally Significant Infrastructure' as provided in Chapter 2 of the Proposed Plan as follows (deletions in strikethrough, amendments underlined):

'Regionally significant infrastructure includes:

- Pipelines for the
.
- ~~Paraparaumu Airport~~ Kapiti Coast Airport
.'

AND

7.1.2 Such other additional or consequential relief as is necessary to achieve consistency with the above and to satisfy the concerns of the KCAHL.

8.0 IDENTIFICATION OF KAPITI COAST AIRPORT ON THE PLANNING MAPS

KCAHL **supports** the inclusion of Kapiti Coast Airport in the Maps of the Proposed Plan. However, it is noted that the lines, labels and height restrictions identified by the Maps for the Airport are out of date and do not reflect current or future operations. It is therefore considered important that the Maps of the Proposed Plan are amended to ensure consistency with the policy framework of the Proposed Plan and protects the Airport as significant infrastructure in the Wellington Region.

8.1 RELIEF SOUGHT

KCAHL **seeks the following decision from the Council:**

8.1.1 Amend the Maps contained in the Proposed Plan that relate to the Kapiti Coast Airport showing lines, labels and height restrictions to ensure they correctly identify current and future Airport operations.

AND

8.1.2 Such other additional or consequential relief as is necessary to achieve consistency with the above and to satisfy the concerns of the KCAHL.

KCAHL WISH TO BE HEARD IN SUPPORT OF ITS SUBMISSION

IF OTHERS MAKE A SIMILAR SUBMISSION KCAHL WILL CONSIDER PRESENTING A JOINT CASE WITH THEM AT A HEARING.

A handwritten signature in black ink, appearing to be 'P. Israelson', written over a horizontal line.

SIGNATURE:

(Signature of submitter or person authorised to sign on behalf of submitter)

DATE: 25 September 2015

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