SUBMISSION ON THE

SILVERDALE WEST DAIRY FLAT BUSINESS AREA STRUCTURE PLANNING CONSULTATION DOCUMENTS

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4.	Date of Submission:	23 February 2018

SCOPE OF SUBMISSION:

5. Property Address: North Shore Airport, 270 Postman Road, Dairy Flat 0794

6. This submission relates to the following aspects of the Silverdale West Dairy Flat business area structure planning consultation documents:

   a) The extent of the structure plan area;
   b) Matters within the North Shore Airport Topic Report;
   c) Matters within the Landscape Topic Report and the Business Land Topic Report that relate to North Shore Airport;
   d) Matters within the Background Report that relate to North Shore Airport.

SUBMISSION:

7. North Shore Aero Club ("NSAC") owns and operates the North Shore Airport located at the centre of the Future Urban zoned land at Dairy Flat. The airport has its own Special Purpose – Airport zone under the Auckland Unitary Plan. The functions and strategic importance of the airport will have a large influence on the formulation of the structure plan, which the Council has generally recognised.

8. In principle, NSAC supports the provision of a 'business' area around the airport but wants to ensure that the following matters are appropriately given due consideration and priority when re-zoning the Future Urban land surrounding the airport.

NORTH SHORE AIRPORT TOPIC REPORT

9. NSAC commends the Council for the information provided in the Airport Topic Report which informs the Background Report for the Structure Plan area. The report outlines the businesses operating at the Airport and the context of the Airport with respect to the relevant policy framework.

10. NSAC has the following comments and recommended alterations to the Topic Report to ensure that the role of the Airport is clearly understood, and the upcoming structure planning appropriately plans for its future.

11. Section 1 and 2.2 of the Topic Report notes that the Airport is not within the structure plan area. It is NSAC's strong submission that the Airport is integral to the future planning and development of the Dairy Flat area. It must therefore form part of the Structure Plan area, rather than be treated merely as a neighbouring activity that will be "taken into account". The main reason for this is that the Airport is a regionally significant **transportation** infrastructure asset, which should be given priority consideration when making land use planning and zoning allocation decisions. This is explained more fully below under the Background Report sections.

12. The Airport is described under Section 2.2 of the Topic Report. In terms of an update on airport statistics, NSAC currently has 545 members and 185 aircraft whose home base is North Shore Airport. Approximately 200 people are employed at the airport. The Topic Report should also mention future flight school trends, in addition to forecast aircraft movements, as aircraft movements **from flight training** are set to increase given the world-wide pilot shortage, where 637,000 new pilots are needed over the next two decades, with 40% required in the Asia-Pacific area (2017 Boeing Pilot & Technician Outlook). Already, the flying school has had a 40% increase in student numbers in the last 12 months, and numbers are expected to grow further in the future.

13. NSAC confirms that, in order for the Airport to take advantage of its strategic location and infrastructure capacity, and to accommodate 50 seat aircraft, the

Airport runway requires a 1540m by 150m strip (including runway safety areas). This would entail a 800m extension of airport land to the south-west. It should be noted that an extended runway length would also enhance safety, not only for future operations at the airport, but also the safety of the existing operations.

14. The Council has identified that purchase of land for this extension would be required for any realignment (vertical or horizontal) of Postman Road. NSAC records that there are other mechanisms for ensuring a longer runway length, and that while purchasing the land required is one such mechanism, partnerships are also a possibility, with the designation of land by a Requiring Authority another mechanism available to protect the provision of a runway expansion.

Emergency Training Procedures and Safety

15. The areas to the southwest, west, north east and east of the airport are used when training pilots in the implementation of emergency procedure exercises to simulate the procedures in the event of engine failure or other failure which would otherwise result in an off-airport landing. These procedures are a requirement for training pilots as promulgated by the CAA flight training syllabi, and Daryl Gillett (Chief Flying Instructor) has stated that:

"Civil Aviation rules allow training flights simulating engine failure after takeoff procedures to descend to surface level before ending the simulation. CARs also allow training flights to descend below 500 feet above ground level for the purposes of simulating any necessary emergency procedures."

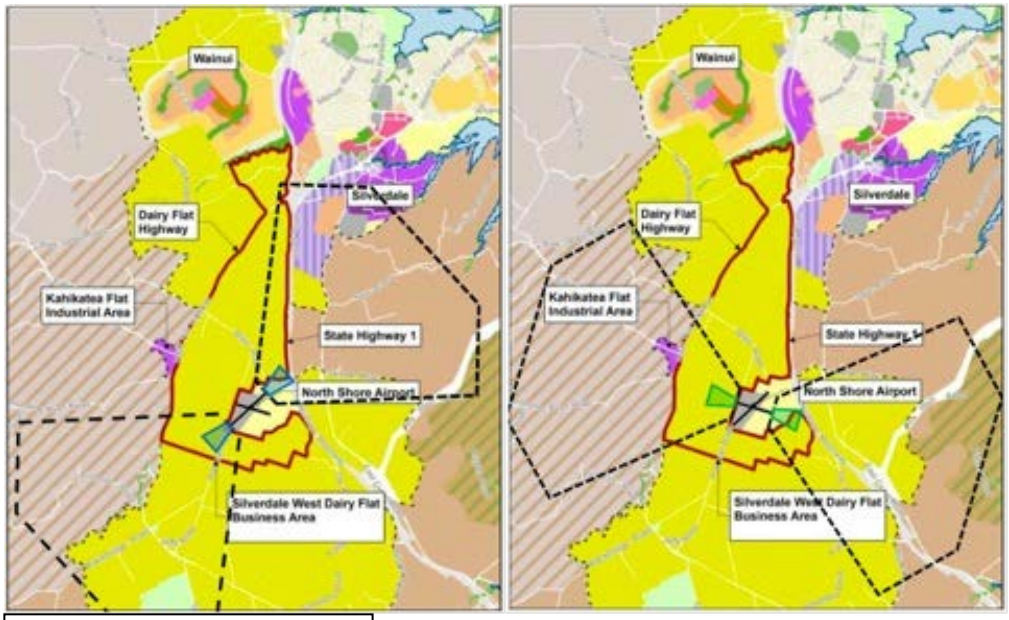


Figure 1

16. These procedures do not follow regular take-off and landing flight paths and can also produce intermittent noise patterns outside what is normally expected at

the airport. They add an extra complexity to the flight patterns over the land surrounding the airport. **Figure 1** shows (as depicted by the dotted black lines) where simulated emergency procedures are carried out, and within which it is most likely that aircraft would be forced to land in the event of an actual emergency. As such, and in accordance with CAA guidance, passive land uses such as reserves, playing fields and golf courses should be located within these areas, to provide for off field landing opportunities to protect aircraft occupants and the public in areas where simulated emergency procedures are carried out.

17. The safety of persons on the ground in the event of an emergency also needs to be considered. If a pilot is required to undertake an emergency landing, the most common location for an emergency landing would be the area shown as dotted black lines at **Figure 2** for an extended main runway (Runway 03/21), and **Figure 1** (right picture) for the crosswind runway (Runway 09/27). Airport safety for emergencies is a major consideration which the Council must plan for.

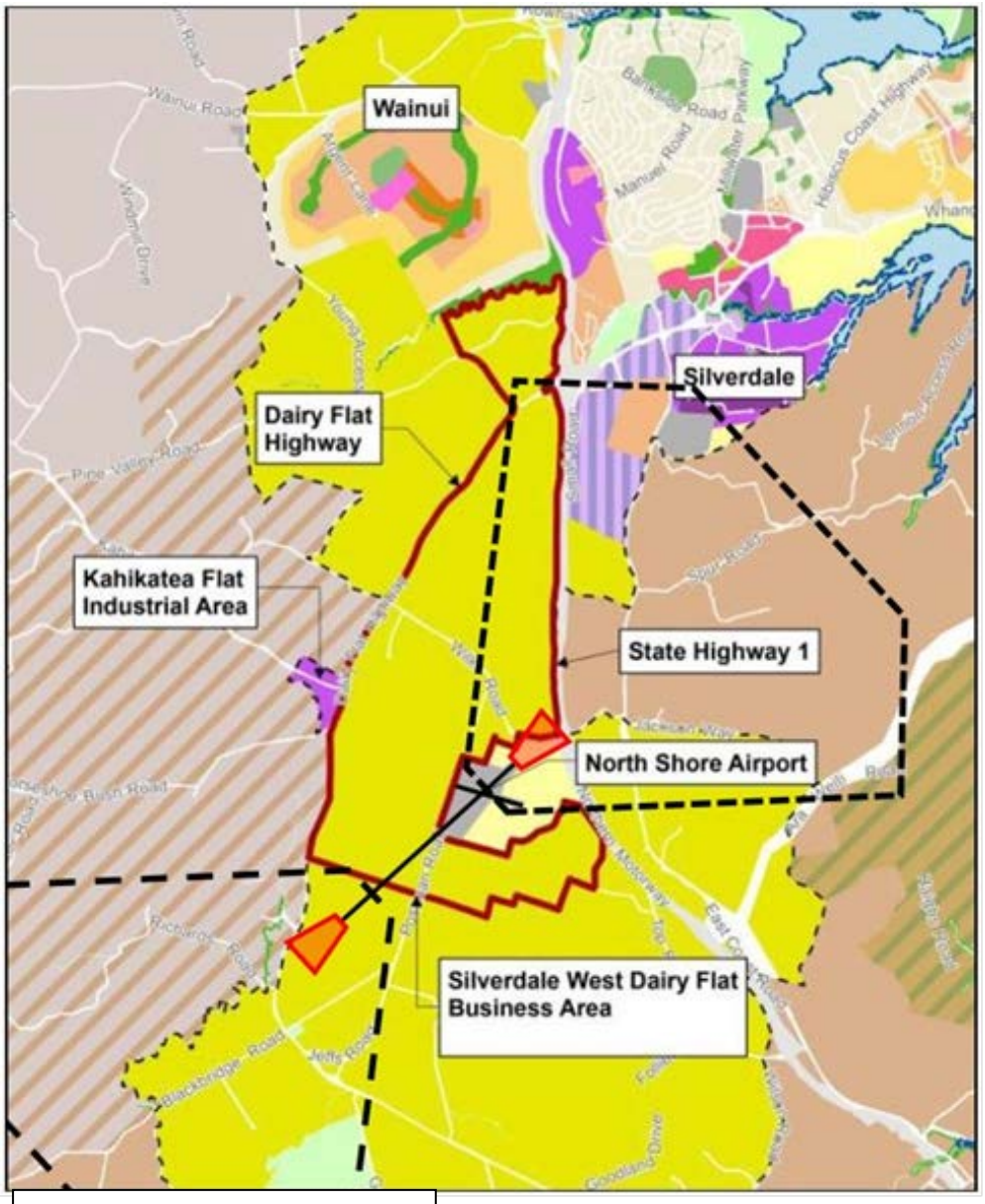


Figure 2

Extension of Structure Plan Area

18. NSAC re-iterates the reasons for extending the business area land to beneath the 55dB Ldn noise contours, as outlined at Page 6 of the Topic Report. NSAC considers that, without an appropriate non-residential zoning on the land to the south-west, considerable reverse sensitivity effects will result if residential uses are zoned for this area, or the re-zoning is not considered in a holistic manner (by inclusion of this land and the Airport within the Structure Plan area).

19. The predominant take-off pattern is to the south-west (SW). Aircraft use the most power, and therefore create the most noise, on take-off. In addition, aircraft enter the circuit pattern by undertaking a left-turn after take-off, in order to facilitate safe and orderly departures and arrivals at the airport, as defined by the Civil Aviation Rules. As stated in the Topic Report, the number of aircraft movements is only expected to increase, and NSAC also predict that it will increase, thereby highlighting the importance of zoning allocation decisions for the area to the south-west of the airport.

20. It would be sensible to include the land to the SW now to avoid incompatible development occurring. It would also provide the Airport and the public with assurance that, for the predominant take-off area, the hazards relating to air transport are being identified by the Council and are being appropriately managed. The safety of persons on the ground would then be enhanced with this inclusion to the Structure Plan area.

21. To provide for the appropriate level of safety along the predominant take-off path, and to accommodate the aircraft noise arising from take-offs and landings to the south-west, it is critical that land uses and zoning are considered as part of the current structure planning for that land beneath the 55dB Ldn. This strategy will avoid confrontation arising from the absence of proper planning, and would prioritise the land use needs of the Airport as a critical element of a growing city.

22. In the evidence for the Unitary Plan hearings, Mr Dave Park (aeronautical specialist) noted that, based on Land Use Planning Guidelines and data from throughout the United States, the ultimate result from reverse sensitivity issues arising from incompatible uses near an airport is the closure or relocation of the airport. NSAC and Mr Park have previously advised the Council that there are no alternative sites available for an airport to the north of Auckland within a suitable distance to the urban population. The absence of any alternative sites highlights the strategic importance and value of the North Shore Airport as a key "supporting growth" infrastructure asset.

23. Inclusion of land subject to the Airport Noise Overlay within the Structure Plan area will ensure that only compatible uses are provided for in an area that is arguably most affected by airport operations.

Strategic Context

24. NSAC notes that the Airport Topic Report provides a good analysis of the airport's relevance to the Auckland Plan. The Auckland Plan provides direction to protect critical transport infrastructure such as North Shore Airport. NSAC confirms that the Airport is poised to offer a significant regional contribution to the regional transport economy by providing further and more frequent air connections. In this context, the connections to and from the Airport should be managed as a 'single transport system', and be integrated with any upgrades to the regional road network.

25. The Future Urban Land Supply Strategy has identified the Silverdale West Dairy Flat business land subject to the structure planning as being ready for development in the period 2018-2022. As noted in other NSAC submissions, this timeframe has considerably shortened the time that the Airport would have had to work with the Council and other parties to plan the Airport's future development. The future contribution of the Airport to the regional economy, transport systems, and infrastructure, must not be squandered by any lack of resources available in the condensed timeframe. To this end, any statutory mechanisms to protect the future expansion of the Airport should be identified during the Structure Plan process to avoid missed business and air transport opportunities, and provide the necessary infrastructure for a growing city.

26. The Airport Topic document provides a good outline of the relevant sections of the AUP applying to the Airport. What is not mentioned is the hierarchical nature of the policy framework, where the Regional Policy Statement (RPS) sits at the top and the district plan provisions (including the Airport Approach Surface Overlay and Aircraft Noise Overlay, zone and precinct provisions) give effect to the policy statement.

27. Therefore, when preparing the Structure Plan, the resulting overlays, zones, and precincts applying to the structure plan area must give effect to the RPS. The transport and infrastructure RPS policies provide for the '*identification and protection of existing and future areas and routes for developing Auckland's transport infrastructure'*. The Structure Plan will be the pre-cursor document to the Council-proposed Plan Change for the Dairy Flat area. In order for the Plan Change to satisfy the statutory injunction "to give effect to", it is important that the Structure Plan be aligned accordingly.

28. The Airport Topic document should also record that, under the Structure Plan Guidelines at Appendix 1 of the AUP, a structure plan must also '*integrate land use and development with the local and strategic transport networks*' (Section 1.4.6(1)). This would include air transport. Under Section 1.4.7 Infrastructure of the Structure Plan Guidelines, the following matters are noted, which are also not detailed in the Airport Topic Report:

(1) The location and protection of existing and planned infrastructure, including network infrastructure corridors.

(2) The location, scale and capacity of existing and new infrastructure to serve the structure plan area.

These matters are considered important to the future structure planning process.

Civil Aviation Act 1990

29. The Topic Document outlines the guidance that the Civil Aviation Authority has produced and the Civil Aviation Rules that relate to land use planning. It mentions the use of runway protection zones (RPZ) as a way of protecting people and property on the ground. The CAA Guidance Material for Land Use at or Near Aerodromes June 2008 states:

"*Land use within the RPZ is generally restricted to such land uses as agricultural, golf course, and similar uses which do not involve congregations of people or construction of buildings or other improvements that may be obstructions. Land uses prohibited from the RPZ are residences and places of public assembly including churches, schools, hospitals, office buildings and shopping centres.*"

While the Topic Document also details that no runway protection zone rules have been put forward by the CAA or Councils to date to constrain land use in this way, NSAC strongly agrees with the use of RPZ's as a way of sustaining the long-term future of the Airport, the safety of aircraft operations, and people on the ground. The RPZ dimensions are determined by the aircraft approach speed and runway approach type.

30. With the current rural land uses bordering the Airport, NSAC has not needed to contemplate the use of such a tool. With the urbanisation of land around the Airport, any future structure planning should provide an RPZ. NSAC submits that the RPZ for North Shore Airport should be provided beyond the end of each runway and have the following dimensions:

- Inner width 150m
- Outer width 303m;
- Length 510m.

The locations for the RPZ's are shown on the attached diagrams at **Figure 1**, with the RPZ's for runway 03/21 and runway 09/27 are depicted in blue and green respectively. **Figure 2** depicts the location of the RPZ for the proposed extension to Runway 03/21 in red.

31. In accordance with relevant guidance and best practice, it is critical that within the RPZ's, parks, playing fields, golf courses and other compatible land uses are established so that in the event of engine failure, or other emergencies,

potential landings sites are available. This will minimise the risk to persons and property on the ground. The RPZ will provide for:

a) The type of aircraft that an expanded airport would accommodate;
b) Allow for approach visibility minima with precision instrument approach operations.

Constraints and Opportunities

32. The Airport Topic document (page 15) refers to the 'Lack of certainty about airport expansion plans' as a constraint in relation to the Structure Plan area. The Airport's Master Plan has been under internal review with the advent of the PAUP process, FULSS and now the Structure Plan. Accordingly, NSAC have not finalised their review of the Master Plan for the Airport due to the reciprocal lack of certainty in the Structure Plan. However, runway expansion plans that NSAC considers meets the needs of Auckland, with respect to a functional regional airport, would entail an approximate 500 metre extension of the current main (03/21) runway to enable 50 seat aircraft to access the Airport, bringing the Airport up to Code 3C instrument category.

33. An extension of this length would enable the Airport to function and serve as a viable regional facility, providing air transport and freight to most regional locations within New Zealand. Larger aircraft are a necessity as public perception deems larger aircraft to be safer aircraft. Larger aircraft in the 50-seat territory are also of large enough scale to operate with financial efficiency on longer regional routes, with the speed to make travel times competitive with services from Auckland International Airport.

34. Such an expansion proposal presents a unique opportunity by enabling the provision of a regional airport to serve a growing Auckland. Providing the public with a regional air transport alternative to Auckland airport will drive significant economic growth to the area, and feed into the airport-related business hub, already identified as an opportunity.

35. The most significant opportunity that this regional transport option would provide is the savings in time and travel costs to currently 500,000 people who live closer to North Shore Airport than Auckland International Airport, for accessing regional flights. This number of people is expected to grow to approximately 1 million in the next 30 years using population projections from Statistics NZ. These travel and time savings also assist in relieving traffic volumes accessing Auckland International Airport, and providing landing slots for smaller aircraft displaced from Auckland Airport.

36. Additionally, these economic benefits do not account for improvements in freight volumes and flight times to the rest of NZ; tourism opportunities for the Hibiscus coast and the Northern Auckland area; and an increase in private aircraft movements and pilot training.

37. It is therefore considered that the following should be included in the Topic Document as an additional opportunity:

- Expansion of North Shore Airport to provide a regional transport facility.

BACKGROUND REPORT

Structure Plan Area

38. The first aspect of concern in the Background Report is the location and extent of the Structure Plan Area. As detailed under paragraphs 17-22, extension of the Structure Plan area beneath the 55dB Ldn noise contours, particularly to the south-west, will enable a proper consideration of compatible uses for an area that is highly affected by airport operations. While it is acknowledged that a future plan change could consider this area, there is a strong planning logic to considering this area now, to ensure that the Airport's current operations and future potential are not compromised by piecemeal urban development. In addition, there is a community expectation that the Future Urban zoned areas, outside the current Structure Plan area, will be zoned for residential purposes in the future. This places a difficult burden on the Airport to continually re-align these expectations for those areas affected by airport operations, whereas consideration under the current process will allow a clear understanding to be obtained by all parties of the reverse sensitivity issues facing these areas.

39. A further aspect to be considered, regarding the location of the Structure Plan area is that, as a regionally significant transportation infrastructure asset, the Airport's location will drive and influence the zoning decisions for the surrounding area. Given this, it should be treated as an integral part of the Structure Plan area, so that appropriate consideration can be given to all the effects that the Airport will have on land development.

40. An example of where the analysis to date may have resulted different conclusions if the Airport were within the Structure Plan area, is the detail within the Landscape Topic Report. This Topic Report refers to landscape mitigation measures recommended for the Silverdale West Area (page 8), and includes "*a planted interface with tall trees along the eastern edge of the structure plan area (adjacent to State Highway 1) providing filtered views to assist in integrating the development into the wider landscape when viewed from the motorway*". If the Airport had been part of the Structure Plan area, the author would have assessed the landscape with the footprint of the Airport, and its wider influence, in mind. A different mitigation measure would have been identified than a 'planted interface with tall trees'. In this case, the obstacle limitation surfaces projecting from the northern end of Runway 03/21 (the 'main' runway), not to mention the turbulence caused by trees, need to be

considered. The predominant approach and take-off path for aircraft coming into land imposes height limits for tall trees in this area.

41. Other conclusions, within the Constraints and Opportunities section of the Landscape Topic report, may also have been different if the Airport was part of the Structure Plan area. The visual landscape from the air would come into play, also consideration of the obstacle limitation surfaces at the southern end of Runway 03/21 (main runway), and for Runway 09/27 (the cross-wind runway).

42. Similarly, another notable lack of consideration for the Airport's location and its influence on surrounding land uses is found within the Business Land Topic Report. As a result of the Airport's exclusion from the Structure Plan area, the Airport is not mentioned, either as an influence on: the types of businesses that can locate in close proximity to the airport; or as a driver for business (by creating quicker transport pathways to the rest of NZ, and thereby increasing economic competitiveness and productivity).

43. It should be noted at Page 11 of the Business Land Topic Report that the provision of business land within the Structure Plan area would help manage conflicts between incompatible activities (being activities incompatible with aircraft operations). Therefore, the sentence analysing the RPS objectives should be altered to state:

"*The provision of business land in this location would conform to many parts of these RPS objectives, such as meeting current and future demands for commercial and industrial opportunities, promoting economic development,* ***and be generally compatible with airport operations***."

44. Furthermore, it should be noted at Page 12 that efficient access to freight routes also includes the Airport. Only SH1 is mentioned, revealing a limited remit around 'land transport' planning.

45. If the Airport is incorporated within the Structure Plan area, the constraints and opportunities section of the Business Land Topic Report would recognise the opportunity for business land being close to the Airport, recognise its future potential as a business/transport hub, and also its influence on adjoining land uses.

46. Given the omission of the Airport as a consideration that has influences on business land issues, the sensible and simple way to ensure that the Airport is given its due consideration in this context, is to include it within the Structure Plan area.

47. This proposition is also supported by the Structure Plan guidelines found at Appendix 1 of the AUP. Section 1.2 promotes the preparation of structure plans to support **any** of the following:

"(1) identifying greenfield land suitable for urbanisation;

*(2) rezoning of existing urban areas for more intensive uses or for **comprehensive redevelopment**;*
(3) rezoning of Future Urban Zone land for urbanisation; and
(4) establishing new or significantly expanding existing rural and coastal towns and villages."

Under these guidelines, land does not need to be subject to a Future Urban zone in order to be the subject of a Structure Plan.

Auckland's Growth Challenge

48. It is appropriate to note that providing for an extra 550,000 – 1,100,000 population increase (out to 2046) requires transportation connections. Air travel is a vital component of all modern transport systems. Access to air transport options is expected in today's society and is a key enabler for any region. Structure planning should therefore protect Auckland's limited ability to provide air transport access to a significant portion of its population.

49. In comparison to other major cities, Auckland will reach crisis point prior to 2040 (we estimate 2036) with the absolute need for a second airport with the capacity to handle passenger volumes in the millions. Looking at some other cities around the world:

a) Sydney has 1 major Airport with 3 runways collectively handling 42.6 million passengers per annum;
b) London has 5 major airports with a combined 6 runways collectively handling 153.8 million passengers per annum.
c) New York has 3 major airports with a combined 9 runways collectively handling 127 million passengers per annum.

Analysis shows that an average of 38.5 million passengers are handled per major airport and 17.9 million passengers handled per runway.

50. Looking at airport expansion plans, recent and well popularised headlines tell us that London Heathrow is building another long-anticipated runway, New York La Guardia is being essentially rebuilt from the ground up, New York John F Kennedy is planned to be heavily redeveloped, and construction is about to begin on Sydney West Airport.

51. Auckland International Airport are predicting 40 million passengers per annum by 2040 with their second runway operational. With 40 million passengers per airport and 20 million passengers per runway by 2040, these figures put Auckland in a more heavily restricted position than any of the cities previously mentioned. Auckland will be in crisis by the mid-2030's and certainly by 2040 if a second regional airport is not available and operational with capacity to handle significant passenger numbers.

Opportunities and Constraints

Transport

52. In relation to the Transport section of the Opportunities and Constraints section of the Background Report, NSAC is very concerned that the transport aspirations and proposed transportation network that has been identified thus far does not include air transport. It is disappointing that the Supporting Growth transport concept diagram, displayed at Figure 5 in the report, omits to show the Airport, where it is a key element of the transport network.

53. Accordingly, the Council needs to take a lead role in the Structure Plan work by directing AT and NZTA to acknowledge that the transportation network must include the Airport as a future key connection within the network. The Council also needs to consider how the features of the network, will incorporate the Airport. This particularly applies to:

- The Rapid Transit Network
- The new north-south connection between Albany and Orewa
- The new and upgraded east west connections, including Wilks, Kahikatea Flat, Pine Valley, and Awanohi Roads
- Implementation of a cycle network.

54. It is therefore recommended that the Airport representatives be part of "Key Stakeholder" workshop planning for the proposed transport network to ensure that the network routes take appropriate account of:

- The airport approach paths and runway protection zones, both current and future.
- The proposed location of the main Runway 03/21 across Postman Road.
- The integration of the Airport with Park and Ride, the motorway network, and the development of the airport as a significant regional transport hub.

55. It is essential that NSAC's input be provided when the ITA is prepared for the Structure Plan.

Water and Wastewater Servicing

56. The indicative Water Servicing plan at Figure 9 shows the conceptual location of a trunk pipeline from Albany and bulk supply points along that pipeline. NSAC is concerned that the location of the pipeline along Postman Road, and the bulk supply point at the southern edge of the Structure Plan area may impact on the current operation and future functioning of the Airport, depending on the design and robustness of the servicing system. For example, if the bulk supply point is a large reservoir, this may be either complementary, or detrimental, to the

Airport's operations, depending on its location and design. The conceptual location may interfere with an extended runway location; however this can only be determined with careful discussion between the designers of the servicing network. Generally, the location of water/wastewater bulk infrastructure close to the airport is seen as positive, as it provides a complementary use within approach paths, provided the utility does not protrude beyond the obstacle limitation surfaces, produce smoke, dust and steam, or provide a location for dangerous substances, that may interfere with the safety of aircraft.

57. Bearing this in mind, the wastewater network modelling study should consider that synergies can be achieved by planning appropriate wastewater infrastructure close to the Airport. Such co-locations should be factored into the wastewater modelling.

58. Given the above, consultation with Airport representatives is critical to ensure that the needs of both infrastructure providers (being Watercare and NSAC) can be met.

Natural Character, Landscape and Visual

59. As stated in paragraphs 37 and 38, inclusion of the Airport within the Structure Plan area is important to address the visual mitigation of development within the area. It is agreed that the critical matters to address in the Structure Plan are the area's interface with SH1, and the need to visually 'break up' the appearance of development when viewed from an elevated perspective, as this 'elevated perspective' also includes views from the air. With an increase in air movements over time and expansion of the Airport, the air approaches and circuit patterns surrounding the Airport will provide the first visual exposure for many people to the landscape qualities of the area. Accordingly, innovative precinct provisions could be conceived to address the visual impacts of development and buildings from the air.

Open Space and Recreation

60. It is noted that the location of the Structure Plan business land may offer opportunities for inclusion of a 'Special Zone' for major recreational facilities. It is suggested that the location of the Airport could act as a 'gateway' to the location of these facilities, particularly as a regional air transport facility, where national competitions and events could be easily accessed and serviced from the Airport. Therefore the "Special Zone' could be close to the Airport and other aligned transport services (such as Park and Ride, rapid transit).

61. Any large open space provision could be dovetailed with the needs of the Airport, particularly on the runway approaches, as many open space uses are considered complementary to the Airport use, being:
    - Gardens;
    - Cemeteries;
    - Golf courses;

- Riding academies;
- Large playing fields (not within a stadium, or having seated capacity).

62. The greenways could also be located in areas sensitive to aircraft operations, and provide connections for walking and cycling past the Airport.

63. Overall, it is considered that this section of the Background Report needs to address how the provision of open space can mesh with the needs of the Airport, so that the location of open space is appropriately identified under the Structure Plan.

Business Land

64. This section should record, at Page 38, that the business land would benefit from the location of a regional airport in the vicinity. It should also note that, in addition to the area required for road reserves and flood protection, some land will be required to protect the Airport operations and its future importance as a regional transport hub.

Airport

65. NSAC supports the conclusions of the Airport section of the Background report regarding that the Structure Plan process needs to consider the effects on the Airport and the effects of the Airport on future land uses. NSAC has endeavoured to alert the decision makers in the past that the Airport is an important infrastructure asset that cannot be replaced. As noted, the Airport's strategic location and established investment can make a significant contribution to the economic and social well-being of a major section of Auckland's population.

66. NSAC submits that the expansion of the airport is a necessity, given that North Shore Airport is the only viable airport site north of Auckland, and given the long-term population growth of the Auckland area. It also sees it as an opportunity that needs to be protected for the future of all Aucklanders. NSAC is also open to entering into a partnership relationship with the Council to explore and develop these proposals.

67. In the meantime, the structure planning must allocate appropriate and complementary zones surrounding the Airport, so that the opportunity of the Airport to become a regional transport hub is not foreclosed.

<u>Silverdale West Dairy Flat Business Area Structure Planning Issues and Concepts</u>

68. It is noted that the CAA regulations are missing from the list of statutory and non-statutory requirements for structure planning. The CAA rules manage the safe and effective use of airspace, which is relevant to the structure plan area surrounding the Airport. The Obstacle Limitation Surfaces and Wildlife Hazard Management procedures are CAA requirements that are particularly relevant.

69. Under Section 6.2.1 (Transport, movement networks) the movement network needs to include walking, cycling, public transport, road and **air** travel within the Structure Plan area, and/or links to air travel. Air transport is a unique part of this Structure Plan area that should not be omitted. It needs to be given priority status as an integral and key part of the transportation network.

70. It is recommended that the Vision for the Silverdale West Dairy Flat Business Area be enhanced to state:

The Silverdale West Dairy Flat Business Area provides the wider Silverdale Wainui Dairy Flat future urban area and the sub-region, with employment opportunities which meet current and future demands, in a quality low impact built environment, ***while taking into account the existing operation and future expansion of North Shore Airport.***

71. The above addition to the vision would appropriately prioritise the Airport as a significant driver of zoning allocation decisions for the Structure Plan area.

72. Under the Key Themes and Objectives for Business at Section 6.3.2 of the Background Report it is suggested that the objective regarding North Shore Airport be added to as follows:

"*Development does not result in reverse sensitivity effects that compromise the ongoing operation* ***and future expansion*** *of the North Shore Airport.*"

This addition would then appropriately give effect to the RPS objectives and policies regarding infrastructure.

73. Under Theme 3 Connections, to ensure air transport is considered as part of the connection system for the area, the following additions to the Objectives are recommended as follows:

- The transport networks **(including air)** respond to anticipated growth by providing efficient, resilient and safe connections, including for freight, within the Silverdale West Dairy Flat Business Area, to the adjoining future residential areas, **North Shore Airport**, and to the wider Auckland region.
- Frequent, reliable and attractive public transport options are provided by enhancing network connections to support the growth in the business area along key transport routes **and North Shore Airport as a regional transport hub**.

74. It is considered that the Objective under Theme 4 – Infrastructure should mention that a significant aspect of any public infrastructure in this area is to service areas beyond the Structure Plan area, by providing through-routes north and south, for example. As a significant transport asset for the area, the Airport

is part of this wider picture. Therefore, the objective should be re-worded as follows:

- Timely and phased public water, waste water and transport network infrastructure meets the growing needs of the Silverdale West Dairy Flat Business Area, **and the wider community where servicing meets regional needs**.
- **The development, operation, and upgrading of North Shore Airport as a regional transportation asset is enabled**.

CONCLUSION

75. By comparing to other cities around the world by population and the number of airports serving those cities, Auckland will need another airport by 2040. This takes into consideration the second runway at Auckland International Airport. The structure planning of the business area needs to ensure that the expansion opportunity for North Shore Airport is not foreclosed.

76. NSAC requests that the above feedback be accepted by the Council and followed up accordingly. NSAC looks forward to collaborating closely with the Council and infrastructure providers to ensure that the next phase of the Structure Plan process provides for the unique location and opportunity afforded by North Shore Airport.

Signed for and on behalf of North Shore Aero Club:



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Kaaren Rosser
Senior Planner

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