SUBMISSION ON
DRAFT SPATIAL LAND USE STRATEGY DAIRY FLAT AND SILVERDALE FUTURE URBAN ZONES
(DATED 6 JULY 2022)

INTRODUCTION

1. This submission follows earlier submissions made to Auckland Council by North Shore Aero Club Inc (NSAC). It seeks to ensure that the significance of North Shore Airport (NSA) for Auckland's transport future is suitably recognised and provided for at the strategic planning level. The proposition is that NSA will transition to become Auckland's second regional airport offering commercial air services to other New Zealand regional centres ("the Proposition").

STRATEGIC SIGNIFICANCE OF NSA

2. NSAC remains concerned to ensure that the importance of NSA as a regionally significant infrastructure asset is fully recognised by Auckland Council in terms of its strategic planning remit and obligations. This is particularly important given that New Zealand Transport Agency (NZTA) and Auckland Transport (AT) are statutorily directed to **land** transportation matters only. In contrast, Auckland Council, through the engagement of its forward-looking strategic planners at the Spatial Planning level, is able to provide for (and certainly not make any decisions that would foreclose) the Proposition.

3. The Airport's current operational ability and modest growth expectations to serve the catchment of 500,000 plus residents north of the Harbour Bridge cannot be overlooked at this important stage in planning for Auckland's urban growth and transport infrastructure (refer plans at **Attachment 1**). This is particularly the case now that the residential intensification projections, following implementation of the NPS:UD 2020 and MDRS directives, are much higher than previously predicted.

4. Notable strategic considerations are as follows:

   (a) A second regional airport is needed for Auckland to improve its transportation resilience as an international city.

   (b) The NSA at Dairy Flat has been identified as the most suitable location for such a facility, as one third of Auckland's population currently lives closer to the NSA than Auckland

International Airport. This percentage is expected to increase as residential intensification occurs within this significant growth corridor.

(c) The future expansion of NSA to provide services for smaller commercial aircraft to provincial centres is expected to have positive traffic effects on Auckland's wider land transport network. It also aligns with the Rapid Transit Corridor and Motorway Interchange initiatives proposed by the Supporting Growth Alliance (NZTA/AT).

(d) The Airport proposes to grow in stages, firstly within its current boundaries, then to expand the runway to the southwest to allow turboprop flights to provincial centres.

5. The Airport is a critical infrastructure element in the strategic development of Auckland and the clear identification of NSA as a "centrepiece" feature, proximate to the proposed RTN route (as shown on the Supporting Growth plans), is welcomed. As noted above, NSA acknowledges that NZTA's and AT's remits are limited to land transport, but this does not preclude Auckland Council from strategically considering all transportation modes at intra-regional and inter-regional levels.

6. Indeed, Auckland Council's strategic planning function obliges it to enable the Proposition until such time as the expanded NSA footprint can be formally protected, in similar manner to Supporting Growth's proposal to now shift the focus of its work programme to formal route protection measures.

7. To date, Auckland Council strategic planners have not proactively provided for the Proposition on the grounds that the owner of NSA (NSAC) does not currently possess the statutory tools to secure and take financial responsibility for the Airport expansion. NSAC acknowledges this position "at this time" and is proceeding to address these requirements. NSAC considers that it is only a matter of time until an agreed structure and business case development enables the Proposition to move forward.

8. Notwithstanding the current land tenure and delivery arrangements for the NSA Proposition, these do not preclude Auckland Council from following the business-as-usual approach to land use planning matters, particularly at a strategic level. That is, the planning system is deigned to permit land use activities (by way of District Plan zoning/rules, and resource consents) irrespective of a landowner's ability to give effect to a planning permission.

9. NSAC therefore submits that it is open to, and respectfully suggests that it behoves, Auckland Council to avoid local roads and reverse sensitivity activities in locations that would fail to protect future delivery of the Proposition at the strategic planning level. Opportunity exists now for Auckland Council to learn from past lessons with Auckland Airport and to plan the Future Urban Zone in a manner that will avoid any need to impose HANA and MANA overlays belatedly and retrospectively with major cost implications. Other relevant considerations are set out below.

PROPOSED METROPOLITAN CENTRE

10. NSAC supports the Council's identification of a proposed Metropolitan Centre for Silverdale Dairy Flat in the general location shown on the "Preferred Option" plan.

11. NSAC also supports the proposal for the Metropolitan Centre to have its own station within the Rapid Transit Corridor (RTC). The location of the proposed Metro Centre station aligns well with the NSA's identification of a future "North Shore Airport Station", which is effectively in a mid-point location between the Metro Centre and Milldale Centre stations. NSA has separately submitted to Supporting Growth that detailed route alignment of the RTC proximate to the Airport should be discussed further between NSA and Supporting Growth as respective proposals are advanced.

12. At a strategic level, NSA supports the proposed RTN for North Shore as this aligns with the future transportation "blueprint" announced by the Minister of Transport for Auckland Light Rail (ALR). ALR recognises and future proofs a future light rail line to the North Shore via a new harbour crossing. As a key infrastructure and transportation asset, NSA's location enables the ALR to connect Auckland's international and domestic airport in the south with a future second regional/domestic airport in the north.

13. A rapid transit station could be located west to north-west of the existing Airport terminal to allow direct connectivity and enable a high proportion of people to arrive at the Airport by rapid transit. It would also allow convenient access to and from the Airport, not only for passengers but also for workers at the Airport and the surrounding proposed industrial area. A station with a park and ride facility would also align well with the Airport in terms of serving both passengers and workers.

14. The Minister of Transport has recently advised NSA that more information is needed "at this time" to demonstrate that the Proposition will be a helpful addition to the transport network, with future infrastructure requirements also needing to be identified. Supporting Growth's identification of the proposed RTN is therefore welcomed as a key piece of infrastructure that supports the Proposition's integration with Auckland's future regional transportation network

15. NSA supports the general location of the Metropolitan Centre as shown at Figure 12 of the Spatial Plan. However, NSA advises that care will be needed when defining the actual extent of the associated Terrace Housing and Apartment Building (THAB) zone having regard to the location of existing and proposed Aircraft Noise Overlays. NSA is currently able to extend and widen the existing main runway within the Airport's existing footprint, with this likely to result in an expansion of the current Aircraft Noise Overlay. NSA therefore requests Auckland Council to engage fully with NSA, as a key transport and infrastructure stakeholder, in all land use planning matters that may impact negatively on future delivery of the Proposition.

POSTMAN ROAD

16. As previously advised to Auckland Council and Supporting Growth, a modest runway extension to the south-west is required for the Airport to reach its full potential.

17. NSA is pleased to note that Postman Road is not identified as a "new and upgraded road" in the latest Supporting Growth plans. This leaves its future re-alignment (as a local roading asset) open for discussion between AT and NSA as needed. The location of Postman Road needs to allow for the proposed runway extension and the provision of new Airport terminal facilities, car parking and flight training facilities.

18. NSA is also concerned to note that Auckland Council continues to propose a west to east collector road, extending along the southern boundary of the NSA (as shown in the Dairy Flat Structure Plan). This proposed road was included in the Council's Structure Plan for Dairy Flat against the advice of NSA which remains strongly opposed to it. Any similarly proposed road(s) proximate to the Airport's proposed runway extension would also be strongly opposed by NSA on the grounds that it would be inadvisable for Auckland Council, as the strategic planning authority, to make any decisions that might adversely affect future realisation of the Proposition as a "public good". It is therefore submitted that the Structure Plan should be consequentially amended and brought into alignment with the higher order Supporting Growth roading proposals.

WILKS ROAD

19. NSA supports the proposal to establish a SH1 Interchange with Wilks Road. However, it is submitted that a full interchange in this location should be established, in anticipation of future business activities being attracted to the NSA and its Industrial zone environs. In turn, future businesses will need fast regional connections for freight travelling in all directions, and not solely southbound as presently shown on the Supporting Growth plans. A full interchange will also support the large areas of intensive residential growth now proposed within the Future Urban Zone. It will also reduce the risk of future congestion points developing at the other proposed Motorway interchanges.

20. The upgrading details and final alignment of Wilks Rd near to, and including, the motorway interchange needs to be carefully planned in conjunction with NSA given its proximity to the main approach path and Runway Extension Safety Area (RSEA) at the northern end of the Airport.

SUMMARY

21. In summary, it is emphasised that there is no other suitable location north of the Harbour Bridge to supply Auckland's future air transport needs. The proposed expansion of NSA will have the following key benefits:

    a. provide an alternative location for turbo-prop aircraft to serve a catchment of more than 500,000 residents north of the Harbour Bridge (similar to the role Kapiti airport provides in the Wellington region and secondary airports do in many cities around the world).

b. ease landing and takeoff pressure for jet aircraft at Auckland Airport by providing an alternative option for turbo-prop and smaller aircraft movements displaced from Auckland Airport.

c. provide room for business aircraft and charters and expand the current fleet of more than 200 aircraft resident at NSA.

d. provide safer, better, and expanded facilities for the Flight Training School.

e. alleviate some road traffic pressure on the Harbour Bridge and other roading approaches from the north and west to Auckland Airport.

f. enable opportunities for other commercial activities in the area to connect with, and utilise, the expanded arterial roading and rapid transit networks proposed by Supporting Growth.

22. NSA looks forward to working with Auckland Council (and Supporting Growth) as the strategic considerations raised in this submission are brought into alignment.

North Shore Aero Club Incorporated
By its duly authorised agent: Haines Planning Consultants Limited

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