
SUPPLEMENTARY PREFERRED OPTION REPORT TO DISTRICT PLAN COMMITTEE

DATE: 25 July DPC Meeting

TOPIC NAME: Rural

SCOPE DESCRIPTION: Rural - Airfields - West Melton Airfield (RU204WM)

TOPIC LEAD: Robert Love

PREPARED BY: Vicki Barker

EXECUTIVE SUMMARY

<i>Issue(s)</i>	<i>The development of specific provisions to apply to the West Melton Airfield to provide the Airfield with greater recognition and development flexibility.</i>
<i>Preferred Option</i>	<i>To proceed with the development of specific provisions that will apply to the West Melton Airfield. Specifically, an Outline Development Plan type approach subject to further information and development during the section 32 and drafting phase and targeted stakeholder engagement.</i>
<i>Recommendation to DPC</i>	<i>That the Preferred Option for the West Melton Airfield is endorsed for further development (targeted stakeholder engagement, followed by Section 32 and Drafting Phase).</i>
<i>DPC Decision</i>	<i>“That the Committee endorses the Preferred Option for ‘West Melton Airfield’ for further development and engagement.”</i>



1.0 Introduction

At the March 28 2018 District Plan Committee Meeting a Preferred Option Report for Airfields, Airstrips and Helicopter Landing Pads (RU204) was presented and discussed with the Committee.

Part of that report discussed the West Melton Airfield and that the Canterbury Aero Club (the Club) consider the current District Plan rules too onerous in relation to their facility, resulting in ad-hoc resource consents and a lack of ongoing certainty. A range of particular management options were considered in relation to the Airfield, including designating, zoning, scheduling, a policy overlay, or the status quo with amendment, i.e. to rely on the existing Rural Zone but with amendment to improve the relevant provisions.

Based on the Baseline Report analysis, the Preferred Options Report recommended the status quo with amendment (Option 2) be pursued in relation to the West Melton Airfield for the reasons outlined in that report. The option of an Outline Development Plan type approach was identified as the next most feasible option.

After considering the Preferred Options report, the Committee endorsed recommended Option 2 for further development with the exception of the West Melton Airfield. With respect to the West Melton Airfield the Committee directed that further discussions occur between staff and Airfield representatives *“to progress the development of specific provisions that will apply to the West Melton Airfield”*. That further work is the subject of this report.

2.0 Summary of approach

The following work has been undertaken to inform this Supplementary Preferred Option Report:

- A meeting was held between the Council, the Club and Environment Canterbury (ECan) to discuss the Canterbury Regional Policy Statement and the definition of ‘strategic infrastructure’; the outcome the Club want and the key information requirements; and to identify the potential costs of such an approach and how the costs would be met;
- Ongoing correspondence between the Council, the Club and ECan to better understand the outcome sought and information requirements; and
- Identification of any points of difference between the parties and the implications.

3.0 Outcome of Discussions

A meeting was held between the Council, the Club and ECan on 10 May 2018. At that meeting the three key matters discussed were:

- The Canterbury Regional Policy Statement and the definition of ‘strategic infrastructure’;
- ECan’s views from a land owner perspective and in relation to regional matters such as flood hazard mitigation;
- The Club’s proposal and what they want to achieve, the identification of effects, and potential provisions to manage effects.

Subsequent to the meeting, there was further correspondence between the parties to better understand the proposal and information requirements.

3.1 The Canterbury Regional Policy Statement - Strategic Infrastructure

The 'strategic infrastructure' definition contained within the Canterbury Regional Policy Statement (CRPS) and the associated objectives and policies is considered a necessary consideration for the Council, as if the West Melton Airfield is clearly defined as 'strategic infrastructure', then Council must give effect to the CRPS.¹ This would require the Council to specifically recognise and provide for the West Melton Airfield in the Proposed Plan provisions.

The definition was explored further by the parties. The Club and ECan consider the definition is open to interpretation and that arguments can be made both for and against the facility being considered strategic infrastructure. My view is that the facility more clearly does not fit with the strategic infrastructure definition and that as a result the Council is not compelled to recognise and provide for the facility in the Proposed Plan in order to give effect to the CRPS. However, at the March DPC Meeting the Committee expressed that the Airfield is considered significant infrastructure in the Selwyn context and should have specific recognition and management, hence the direction to progress the development of specific provisions.

Despite the difference of opinion regarding the status of the facility under the CRPS, all parties agree that the Council is still able to choose to develop particular provisions which provide greater recognition and protection to the Club facility and that the CRPS is not a barrier to this occurring.

3.2 General Approach sought by the Canterbury Aero Club

The Club have confirmed that their growth potential is limited due to Civil Aviation Authority (CAA) air space restrictions and that future development will likely be limited to additional hangars and new clubrooms (the extent of the proposed new hangar development is not clear at this point). The Club consider that flights may not necessarily increase significantly and that flight movements are fairly constant throughout the year. The key issue the Club is seeking to address is avoiding the need for resource consent each time they seek to develop and to instead have provisions tailored to their facility which provide development flexibility.

In particular, CAC are seeking an Outline Development Plan/Management Area/Overlay approach² (the 'ODP type approach'), whereby the site is clearly shown on the planning maps with associated provisions tailored to their facility. With this ODP type approach the existing Rural Zoning would remain, but specific provisions would be developed to replace the Rural Zone provisions where necessary.

No significant change to the policy approach is proposed (Policies B2.1.23 and B2.1.24), however an additional stand-alone policy is also proposed to recognise the West Melton Airfield, its

¹ Section 75(3) of the Resource Management Act binds the Council to "give effect" to the CRPS.

² The specifics of the approach will be subject to the final form and structure of the Proposed Plan and what is directed by the National Planning Standards.

importance to the District, and the ability for managed future development in accordance with the ODP.

Specific rules are proposed to include:

- (i) Identified building development areas where new building development will be confined to and specific provisions to manage bulk and location such as maximum height, setback from boundaries etc applied. A Landscape/Visual/Character Assessment would form the basis for identifying the building development areas and building related provisions;
- (ii) Obstacle limitation surfaces - these areas are mapped and restrict the height of any vegetation or structures within the areas (provisions to this effect termed 'approach surface controls' already apply to the site but would need to be updated);
- (iii) Noise contours or a maximum number of annual flight movements with the possibility of an additional weekly or monthly restriction on flight movements to control peaks;
- (iv) A limit on traffic movements - the Club have advised they will prepare a transport assessment to address transport effects.

The Club proposes that exceptions to other Plan rules would apply in relation to the following (where such rules are carried into the Proposed Plan):

- (v) General Noise Rules (should it otherwise apply to aircraft);
- (vi) Scale of activity in Rural zones which restricts built form (as built form would be managed by the proposed ODP approach and associated bulk and location rules);
- (vii) Construction of non-habitable buildings (i.e. hangars) in the flood management area. It is proposed that habitable buildings would continue to be subject to floor level restrictions, i.e. the proposed club house.

It is of note that there are other district-wide rules such as earthworks, lighting, and signage which would need to be considered further in the drafting phase as to whether they apply or if specific rules are developed for the site.

In terms of hazardous substances, the Club is currently applying for consents to install a 10,000 litre aviation fuel storage facility. This work is being carried out by a specialist company (RD Fuels Ltd). It is anticipated that this facility will be established and operational within the next three months. There are no other significant hazardous substances stored on the airfield. All proposals to store fuel on the site are subject to compliance with regulations set out in the Hazardous Substances and New Organisms Act 1996. This will ensure any adverse effects on groundwater are less than minor. The Club recognises the land it occupies is in the Christchurch Groundwater Protection Zone under the Canterbury Land and Water Regional Plan.

3.3 Information Requirements and Costs

The Club are prepared to provide a package of information to the Council to support their proposed approach, including a spatial plan showing where development is proposed/restricted to, associated proposed policies and rules and the necessary assessments to inform and support the proposed provisions. The specific Assessments the Club has agreed to supply at their own cost include:

- Visual Amenity and Rural Character (including a spatial plan which would form the basis for the ODP approach);
- Noise; and
- Transport.

Once this information is received, Council would then be in a position to assess it and use it as the basis to inform the drafting of the provisions. In order to do this, a planning resource would be required (in addition to developing Airfield related provisions in general). In addition, Council would need to engage an Acoustic Consultant to assess the noise related information (AES have provided acoustic engineering advice to Council to date) and a Transport Consultant may need to be engaged if the Transport Assessment is not able to be reviewed and assessed internally depending on staff availability. The Visual Amenity and Rural Character Assessment and the suitability of the spatial plan would be assessed by the Council's Urban Designer.

The costs to Council of reviewing the information and assessments and then preparing the proposed provisions based on the information provided, in correspondence with the Club and ECan as required, is expected to be in the order of \$25,000 for the next Phase (Phase 3 - section 32 and drafting of provisions).

4.0 Additional detail about the noise management approaches proposed

Noise (and reverse sensitivity) are considered to be the key effects that need to be managed as part of proposed provisions. The Club propose either a noise contour approach or a rule which sets a maximum number of flight movements per year and possibly per month and/or week (with no noise limit).

Noise Contours

The Club have provided information relating to Rangiora Airfield as a comparison. The Waimakariri District Council owned Rangiora Airfield is currently subject to a Notice of Requirement (NoR) application to designate the site and an associated Plan Change application³ to provide for air noise contours on the planning maps with associated rules.

The proposed noise contours are shown on a noise contour map (as 55dbA - outer control boundary and 65 dBA - air noise boundary contours) and the Plan rules are sought to be amended to require any noise sensitive activity to be insulated from aircraft noise within the 55 dBA contour and prohibited within the 65dBA contour, and to ensure that noise from aircraft operations does not exceed 65dBA outside of the 65dBA contour (the contours cover private land in part).

The proposed noise contours for Rangiora Airfield have been developed by Marshall Day Acoustics and are based on data from existing airfield operations, the projected future growth, plus a 20% increase to account for monthly variability (120% estimated increase in total). A

³ Planz Consultants Ltd. who represent West Melton Airfield have prepared the Rangiora Airfield NoR and Plan Change application.

number of other factors/assumptions are taken into account such as the aircraft fleet, hours of operation etc.

As an approximate comparison for now, the Club have applied the extent of the proposed Rangiora Airfield contours over the West Melton Airfield to establish approximately how far such contours would extend. Refer to the map provided in **Appendix 1**. These approximate contours extend over ECan land only and do not cover any private land. On this basis, the Club consider that contours will likely have little benefit as the land is not especially noise sensitive (ECan land only) or likely to be developed, and that a cap on flight movements is expected to be a preferable approach from the Club's perspective.

Cap on flight movements

An alternative approach proposed by the Club is to apply a maximum number of flight movements that apply per year, and in addition possibly monthly and/or weekly limits to manage flight peaks.

This would control flight frequency and the overall scale of the operation, which would in turn manage noise effects to a degree, but only if operational noise is managed to an appropriate level in terms of existing and potential future noise sensitive development. Where that level is set (by controlling flight movements) will be the critical point.

Further information required to determine the approach to managing noise

Determining what approach to apply with respect to managing noise (and reverse sensitivity) is underpinned by the need for flight movement data. This data underpins the noise modelling if a noise contour approach is pursued and is critical to establishing an effective cap on flight movements and managing noise (by establishing the existing flight movements and in turn predicting future flight movements).

The Club does not currently have robust flight data. The Club have gathered flight records and extrapolated their estimated annual flight movements from that data; however, on review the Club has advised that it became obvious that the existing information based on landing fees is an under-representation of the numbers as it did not include circuits with 'touch and go' training.

The Club is currently awaiting confirmation from its Executive Members to install an 'Aimms' system which can accurately gather reliable flight data. If and when installed, flight data will be captured over a period of six months. The Club also proposes (with landowner/occupier permission) to install a noise logger at the notional boundary of the nearest dwelling (1176 Weedons Ross Road which is located on ECan land) to get a clearer indication of the noise levels received at this property.

This noise data is considered vital to developing rules which are effective in practice in managing noise (and reverse sensitivity effects).

5.0 Stakeholder feedback

The proposed general approach has been discussed with ECan as both land owner and regulator. The Club were also requested to discuss the general approach with the New Zealand Defence Force (NZDF) as a neighbouring land owner that could be affected by noise contours. The feedback from ECan and NZDF is summarised below.

This report was also shared with ECan and the Club in draft for their feedback. Neither party had substantive comments and did not express any issues with it.

4.2 Environment Canterbury

As landowner ECan confirmed it is the intention to retain the land in the area in their ownership in the long-term and that there is no intention to develop or seek any change in land use. ECan confirmed the Club has a perpetual lease over approximately 77 hectares. ECan support the general approach proposed by the Club and noted that they would not support a designation (which was an option considered but discounted by the Baseline Report and is not supported by the Club either).

As mentioned in section 4.0 there is one dwelling located on ECan land in relatively close proximity to the site. This dwelling may be subject to noise levels from current activity at or above the Operative District Plan standard of 55dBA, which will be determined by the outcome of the noise measurements proposed to be taken at the notional boundary of that dwelling. There are also a number of other leasees in the area including Moore Park and other recreation operators, who would need to be consulted with going forward.

The flooding risk was also canvassed with ECan. The subject site and land both east and west of the site lies within the Waimakariri Flood Plain, which is designated by ECan for flood management purposes (Designation CR11 - Waimakariri River Secondary Stopbanks – River Protection and Flood Control). ECan advised that the subject site is protected by the Waimakariri Primary stopbank. The design flood capacity of the Primary stopbank in this area is 5,100 cumecs which has a flood Return Period of about 500 years (Annual Recurrence Interval approx. 0.2%). Floods larger than this will probably breach the Primary stopbank due to overtopping, but any breach flows should be contained by the Secondary stopbank. There is some risk of stopbank breach in smaller flood events due to erosion or piping failure, but this risk is relatively low.

Currently non-complying resource consent is required for any new dwelling or other principal building⁴ within the Waimakariri Flood Plain Area (Rule 3.1.4). Consequently, the Club have been required to obtain resource consent for a hangar subject to this rule only (RC 165475). The Club are seeking that non-habitable buildings be exempt from the flood hazard rules. ECan commented that any development such as buildings or other structures, earthworks (filling or excavation), and planting (forestry or shelter belts) must not reduce the flood flow or storage capacity of the floodplain or threaten the integrity and flood performance of the Primary or Secondary stopbanks. Therefore, the appropriateness of exempting

⁴ *Principal Building: includes any building or buildings which is/are used as part of the primary activity or activities on the site.*

non-habitable buildings will need to be worked through further with ECan during the drafting phase and can be informed by the Club's building development proposal.

From a practical perspective, ECan consider that recreational operators in this floodplain should also have a basic flood warning and evacuation plan in place as part of their health and safety plan.

4.3 NZDF

The NZDF West Melton Rifle Range is located to the west of the site and is designated for Defence Purposes - Military Training Area (Designation DE3). The Club were requested to contact the New Zealand Defence Force to have a preliminary discussion regarding the approach proposed, which could include potential noise contours near to or possibly over their land.

The Club has made initial contact with Rebecca Davies, Senior Environmental Officer at NZDF, who is responsible for planning issues associated with the activities and facilities of the Army, Navy and Air Force throughout New Zealand. Subsequent discussions outlined that no particular issues are anticipated, however, no formal position has been formed by NZDF at this stage. Further and on-going consultation with NZDF through the development of the planning provisions will be required.

6.0 Preferred Option for further engagement

6.1 DEVELOP AN OUTLINE DEVELOPMENT PLAN TYPE APPROACH

The Project Team has progressed the development of specific provisions that will apply to the West Melton Airfield, and recommends an Outline Development Plan type approach in accordance with what the Club is seeking, subject to further information and development during the section 32 and drafting phase and targeted stakeholder engagement.

The key matter which requires further work is noise management and the need for reliable flight movement data to inform the proposed approach, with input from Acoustic Engineers. Flood management is also a particular matter that needs to be explored further with ECan.

Effectiveness in Addressing Issue: The proposed approach would be effective in providing particular recognition of and provision for the facility as sought by both the Committee and the Club, and could strategically manage the growth of the facility and any adverse effects.

Risks: The risks of the overall approach are considered relatively low assuming the required information is supplied, especially reliable flight data. Without reliable flight data in particular it will be difficult to draft effective noise provisions. The approach is considered consistent with the Draft National Planning Standards which provide for 'Development Area' or 'Overlay' approaches consisting of spatial plans to manage areas and associated provisions.

Budget or time implications: It is estimated that this option will require a budget of approximately \$25,000 additional to the general approach being developed for the Rural Zone in relation to aircraft operations. The Club estimate noise data will take approx. six months to gather, however overall the work is expected to be able to fit within the overall District Plan programme.

Stakeholder and Community Interests: For the next phase a stakeholder engagement plan is recommended to identify the stakeholders (i.e. the ECan lease holders in the area) in addition to ECan and NZDF and to plan what targeted stakeholder engagement is to occur and when. It is not expected that this topic will require full public consultation.

Appendix 1 - Approximate Air Contour Map

