



Generation Zero

This is Generation Zero's submission on Wellington International Airport's (WIAL) Notice of Requirement for the Wellington Airport East Site Project (Project).

We would like to speak at a hearing on this Notice of Requirement if one does occur.

Generation Zero opposes the Notice of Requirement for the Project as:

- The Project does not align with the intended use of the golf course as a buffer between Miramar and the airport as it will greatly reduce this buffer zone.
- The Project is not consistent with the National Policy Statement of Urban Development as it will increase the volume of traffic to and from the Airport contributing to a poor functioning urban environment
- We are not convinced that objectives of this Project are realistic given the reduction in air travel due to COVID-19 and the impacts future climate policy will have on air travel
- No alternatives for the expansion have been considered a key requirement for demonstrating the Notice of Requirement to demonstrate that the Project is the most sustainable way to meet WAIL's objectives
- The Project will have an effect on amenity, may discourage urban intensification in the areas and does not consider the effects of climate change including sea level rise.
- The need for regional consents is unclear so it is difficult to understand the environmental impact of the Project on the environment and is not consistent with integrated decision making.

Our interest in this Project

- Generation Zero is a youth led advocacy group that wants Wellington City to transition to zero carbon by 2050 or earlier in a way that upholds Te Tiriti and climate justice.
- We have supported the adoption of Te Atakura - First to Zero and continue to encourage Wellington City Council to take action to reduce Wellington City's carbon emissions.
- We encourage all businesses in Wellington to adopt similar targets, particularly those like Wellington Airport that have high emissions.
- We are concerned that the expansion of the Airport will increase the number of flights to and from Wellington. This will lead to an increase in carbon emissions associated with travel and put Wellington's goals at risk.
- We are also concerned that WAIL lodged the Notice of Requirement close to the summer holiday season limiting the ability for the public to provide input into the project. We do not think this is a behaviour businesses that want to act on climate change should demonstrate.

The Project does not align intended use of the golf course as a buffer between Miramar and the Airport

- When making decisions on Notices of Requirements the Council must have regard to the relevant provisions in the District Plan.
- Under the operative District Plan the site is zoned 'Airport and Recreation Precinct'. The stated use of the golf course part of this zone is to provide a buffer between the Residential Areas and the Airport operations and to retain as much open space as is practical for golf course and recreational use (Policy 10.2.5.2).
- The expansion into the golf course will reduce this buffer, putting the airport right next to an existing residential area. The expansion will also significantly reduce the area of open space. Therefore we think that the Project is inconsistent with this Policy.

The Project is not consistent with the National Policy Statement of Urban Development as it will generate more traffic, contributing to a poor functioning urban environment

- When making decisions on Notices of Requirements the Council must have regard to the relevant provisions of a National Policy Statement.
- The National Policy Statement for Urban Development (NPSUD) requires planning decisions to contribute to well functioning urban environments. Well functioning urban environments should enable people to get around easily on public and active transport and support reductions in greenhouse gasses.
- We think that the expansion of the airport will lead to an increase in car traffic to and from the airport, especially as there are very limited public transport options at this stage. We are also aware that WAIL is expanding car parking facilities, indicating that they understand traffic volumes will increase.
- An increase in car traffic will put pressure on the transport network, increasing travel time for all road users including people on busses, and increasing the real and perceived risk for people using active transport. We think this will discourage people from using these modes.
- Therefore, as there is a risk that an increase in traffic will discourage public and active transport mode we think that this Project could create a poor functioning urban environment. On this basis we think this project is inconsistent with the NPSUD.
- While WAIL has stated Lets Get Wellington Moving (LGWM) will provide public and mass transit routes to the airport we do not think it is appropriate to assume that this is a guaranteed solution. Decisions on LGWM are yet to be made and we think that there is a significant risk that mass transit routes to the airport will be delayed or not occur at all given the objections to mass transit in the community.

We are not convinced that the objectives of this project are realistic given the impacts COVID-19 and future climate policy will have on air travel

- WAIL is able to set its own objectives for this Project. However these objectives have to be realistic and based on evidence. We do not think that some of the objectives for this Project are realistic given the reasons outlined below.

- Projections for passenger demand were carried out prior to COVID-19. These numbers have not been updated or taken into account the economic impacts of COVID-19 or air travel and the fact that our borders will remain closed until the end of 2021 or mid 2022.
- Expert evidence indicates that even with improved technology the level of air travel in 2019 can't be maintained without fossil fuel aircraft. Additionally, we understand that if Aotearoa and the world are to meet climate reduction targets we would have to reduce air travel to below 2019 levels. This may be done through high carbon charges and or emission reduction requirements that increase the cost of air travel.

No alternatives for the expansion have been considered by the airport so it is not clear that this Project is the most sustainable way to achieve WAIL's objectives

- Council is required to have particular regard to whether adequate consideration has been given to alternative sites, routes or methods of meeting the project objectives. This consideration must be undertaken if it is likely that the work will have a significant adverse effect on the environment. Given the effects of this Project on the environment we would expect alternatives to be provided.
- WAIL has not provided a comprehensive assessment of alternatives methods to achieve their objectives for meeting future passenger demand. No consideration has been given to how they can use the existing airport more efficiently or invest in alternative transport options. Given this we are not convinced that WAIL has met its obligations in lodging this Notice of Requirement.
- Additionally as no alternatives are assessed we are not convinced that the expansion of the airport is the most sustainable way for WAIL to achieve its outcomes.
- WIAL has provided an assessment of alternatives for the Project Site. We agree that this site is the best option available but ask whether the area needs to be as large as it is.

This Project could have significant adverse effects on amenity and urban intensification

- We are concerned that the expansion of the Airport is likely to have the following impacts on the amenity values of the area:
 - increase in noise and vibration from more aircraft travelling to and from the airport.
 - increase in demand for parking could have a flow over effects into the surrounding suburbs
 - visually the airport would look worse than the golf course as people like seeing green spaces over concrete.
- We are concerned that the adverse effects this Project will have on amenity will discourage urban intensification around the airport.
- While the Spatial Plan has not yet been made operative through the District Plan it is clear that Wellington City Council

The need for regional council consents is unclear, meaning it is difficult to make decisions in an integrated manner

- The decision on this Notice of Requirement is being made under the Resource Management Act which requires Wellington City Council to achieve the integrated management of natural and physical resources.

- The expansion of the golf course is likely to require regional consents from Greater Wellington Regional Council. There is limited mention of WAIL's strategy for obtaining these in its Notice of Requirement.
- We think it would be more appropriate for WIAL to lodge the regional consents for this Project at the same time as the Notice of Requirement so people affected by both projects can view the project as a whole.
- Considering all consents and notices of requirements at the same time will also ensure that the adverse effects are adequately managed and reduce the risks that decision makers will assume this is a risk for the other process.

Proposed conditions

- In order to mitigate the impacts this project will have on traffic we recommend conditions be put in place to:
 - require WAIL to fully fund an affordable public transport service to and from the airport. This requirement could lapse once a reliable mass transport route is provided to and from the airport. For the avoidance of doubt avoidable means the cost is equivalent or less than what it would be if the same journey was made on Metlink services.
 - significantly enhance the remaining open space providing a park/reserve that is accessible to everyone and meets a range of diverse needs. Significantly enhance includes planting native flora and encouraging biodiversity.