

15 March 2018

Auckland Council
Unitary Plan
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Attention: Planning Technician

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Submission on Auckland International Airport Limited's notice of requirement (NOR 7) to alter Designation 1100

This is a submission on a notice of requirement from Auckland International Airport Limited (AIAL) for an alteration to Designation 1100. AIAL seeks to alter the length and location of a proposed second runway which Designation 1100 currently provides for in a location north of the existing southern runway and west of George Bolt Memorial Drive.

The sites to which the notice of requirement applies are the Auckland International Airport at George Bolt Memorial Drive, Mangere and the aerodrome surrounding Auckland International Airport.

The following submission represents the views of the Auckland Regional Public Health Service (ARPHS) and does not necessarily reflect the views of the three District Health Boards it serves. Please refer to Appendix 1 for more information on ARPHS.

Yours sincerely,

Dr. Julia Peters
Clinical Director
Auckland Regional Public Health Service

Dr. David Sinclair
Medical Officer of Health
Auckland Regional Public Health Service

Cc: Auckland International Airport Limited

SUBMISSIONS ON A PUBLICLY NOTIFIED REQUIREMENT FOR ALTERATION OF A DESIGNATION UNDER SECTION 181 OF THE RESOURCE MANAGEMENT ACT 1991

To the Auckland Council

This is a Submission by: Auckland Regional Public Health Service (ARPHS)

1. Requiring authority: Auckland International Airport Limited (AIAL)

Alteration is to Designation 1100 Auckland Council District for the proposed northern runway located at George Bolt Memorial Drive, Mangere.
2. ARPHS is not a trade competitor for the purposes of s.308B of the Act.
3. The broad reason for these submissions is to provide objective and independent input to promote the reduction of adverse effects on the health of people and communities pursuant to the Resource Management Act 1991, the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.
4. ARPHS has statutory obligations for public health within this area under Crown funding agreements between the Ministry of Health and the Auckland District Health Board. The Ministry of Health requires public health services to reduce any potential health risks by means including submissions on any alterations to any existing designation to ensure matters of public health significance are considered by the local authority. The proposed alteration includes matters with potential health effects on people and communities.
5. The specific parts of the NOR this submission relates to are shown in the attached schedule with whether we support, oppose or are neutral regarding the specific parts or wish to have them amended, and our reasons are stated.
6. The recommendation we seek from Auckland Council for each submission point is set out in the attached schedule together with reasons. Where we seek amendment to the proposed alteration, or imposition of conditions by stating new words to be inserted into the provisions, or seek amendment to the wording of specific parts, we assert that the scope of our submissions is intended to also cover words to the like effect in the specific part or elsewhere in the proposed alteration or otherwise in the Designation, which might be consequentially added or amended.
7. ARPHS wishes to be heard in support of these submissions at any hearing but is not prepared to consider presenting a joint case with other submitters. ARPHS is willing to participate in any pre-hearing conferences, or mediation.

The contact point for this submission is:

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SCHEDULE OF SUBMISSIONS BY AUCKLAND REGIONAL PUBLIC HEALTH SERVICE

1.

Submission relates to this specific part of alteration to NOR:	Conditions 1. (Definition: "INM").
<p>Regarding this part, we support this deletion.</p> <p>For the following reasons. INM was superseded by a US Federal Aviation Authority directive (see Federal Register 80 FR 27853) effective from 29 May 2015. While utilising INM version 7d has been justified in consideration of 'recent' Unitary plan and Master Plan revision, future modelling will need to migrate to Aviation Environmental Design Tool (AEDT). Not mentioning a specific model in definitions is consistent with NZS 6805.</p>	
<p>The recommendation sought is delete this definition.</p>	

2.

Submission relates to this specific part of alteration to NOR:	Runway system, 4.
<p>Regarding this part, we support this alteration.</p> <p>For the following reasons. The curfew will reduce noise effects and an amendment to Condition 4 was necessary to correct the extended night time restriction to match the basis on which the noise modelling has been undertaken.</p>	
<p>The recommendation sought is retain this proposed amendment.</p>	

3.

Submission relates to this specific part of alteration to NOR:	Noise from Aircraft Operations 5.a.
<p>Regarding this part, we wish amendment as follows:</p> <p>For the following reasons. NZS 6805 cites NZS 6801:1991 as the measurement standard. This has been superseded by the 2008 edition, which corrects errors and limitations in the 1991 version. Part 3 of this standard relating to instrumentation is very dated and modern instrumentation conformance is with modern International Standards cited in NZS 6801. The defect can be remedied by requiring NZS6801:2008 be used instead of NZS6801:1991.</p>	
<p>The recommendation sought is amend this provision as follows: add after "logarithmic average;" new provision "provided NZS6801:2008 shall replace NZS6801:1991 where referenced in NZS 6805."</p>	

4.

Submission relates to this specific part of alteration to NOR:	Noise from Aircraft Operations 5.b. and 5. d. iii.
<p>Regarding this part, we support this alteration.</p> <p>For the following reasons. Further to reasons given in submission point 1, the alteration by mentioning modelling software without limiting usage to INM is consistent with NZS 6805 and will allow future use of AEDT, the FAA mandated successor to INM.</p>	

The recommendation sought is retain this provision.

5.

Submission relates to this specific part of alteration to NOR:	Noise from Aircraft Operations 5. Final paragraph.
Regarding this part, we support this alteration. For the following reasons. An Annual Noise Management Report will improve the way in which information relating to aircraft noise is collected and reported to the community.	
The recommendation sought is retain this provision.	

6.

Submission relates to this specific part of alteration to NOR:	Interim Noise Control on Northern Runway 6. a. and 6.b. ii.
Regarding this part, we support this alteration. For the following reasons. Allows for the projected levels of aircraft noise resulting from a longer Northern Runway for the first five years at the closest affected residential area when the runway is first opened and has significant daily jet movements. The exact numerical value is relatively unimportant as the overall provision will achieve the objective of preventing full exposure of aircraft noise levels on the commencement of the second runway, and would reduce the initial noise impact on residents of Papatoetoe.	
The recommendation sought is retain this provision.	

7.

Submission relates to this specific part of alteration to NOR:	Noise management 9.b.
Regarding this part, we support this alteration. For the following reasons. An annual report available on the website will improve access to information and will align with the annual reporting of noise from Aircraft Operations.	
The recommendation sought is retain this provision.	

8.

Submission relates to this specific part of alteration to NOR:	Noise Management Plan Reporting of noise complaints 9.c.
Regarding this part, we support this alteration. For the following reasons. Reporting of complaints and publishing in a register is a valuable feedback method to identify thematic problems or localities with unforeseen concerns about adverse noise effects.	
The recommendation sought is retain this provision.	

9.

<p>Submission relates to this specific part of alteration to NOR:</p>	<p>Noise Mitigation Programme 10. Further proviso second bullet point.</p>
<p>Regarding this part, we wish clarification.</p> <p>For the following reasons. Council needs to ensure that this clause does not abdicate AIAL’s responsibility to address noise effects (through its noise mitigation programme) in circumstances where it would be considered reasonable to do so; particularly if the noise effects cannot be mitigated through other mechanisms, such as unitary plan provisions and insurance cover.</p>	

10.

<p>Submission relates to this specific part of alteration to NOR:</p>	<p>Existing Buildings Located within the HANA 10.b., and, Existing Buildings Located within the MANA 10.c.</p>
<p>Regarding this part, we support this alteration to both clauses including the changes to minimum air changes per hour, individual switching provision, the numerical decibel values as indoor design criteria, heat pumps, inclusion of kitchen range hoods, and inclusion of cooling measures and heating measures.</p> <p>For the following reasons. The AECOM review highlights the shortcomings of the original programme to date, and takes into account comments made by homeowners who have had a package installed. The recommendations for packages that include a home ventilation system (with heating and cooling function) will remedy the limitations of the existing Certified Standard Packages taking into account changes in technology since circa 2000 when the original mitigation programme was devised. In the absence of amendments to the Building Code, which appear to be on indefinite hold, the best current information is probably the Technical Review of the 2004 CSPs undertaken by AECOM. ARPHS strongly supports the improved moisture control that will consequentially occur where treatment packages are installed. The altered and additional conditions will overcome existing serious winter heating deficiency and summer cooling limitations.</p> <p>The recommendation sought is retain this provision.</p>	

11.

<p>Submission relates to this specific part of alteration to NOR:</p>	<p>Asbestos provision in Existing Buildings Located within the HANA 10.b.i., and, Existing Buildings Located within the MANA 10.c.i.</p>
<p>Regarding this part, we wish amendment.</p> <p>For the following reasons. The asbestos removal exclusion to AIAL cost coverage may for some houses amount in practice to an insurmountable financial barrier for the home owner who would thereby probably be unable to take advantage of the treatment package. Such problems may manifest in the worst quality housing with the greatest need. Since the capital cost of removal would be the barrier to the house owner, but would not amount to such for AIAL, it is suggested the provision could be amended to allow the capital cost of removal to be met by AIAL as part of a treatment package, or individual CIP, with the sum recoverable over time from the owner. Some clarification may be needed in the cases of when the house is owner-occupied, private sector rental or social housing.</p> <p>The recommendation sought is amend this provision as follows: add to sub-clause i. second bullet point, “provided AIAL may meet removal cost where a side agreement or other instrument allows for recovery of removal costs over time from the dwelling owner.”</p>	

12.

<p>Submission relates to this specific part of alteration to NOR:</p>	<p>Conditions 10. Noise Mitigation Programme sub-clauses:</p> <ul style="list-style-type: none"> d. Existing Registered Pre-schools Located Within the HANA <i>and</i> e. Existing Registered Pre-schools Located Within the HANA or the MANA, and, f. Existing Educational Facilities Within the HANA or the MANA, and, g. New Buildings at Existing Educational Facilities Within the MANA, and i. New Public Schools or Pre-schools Within the MANA
<p>Regarding this part, we are neutral.</p> <p>For the following reasons. These topics are jurisdictionally under Ministry of Education agencies.</p>	
<p>The recommendation sought is retain this provision.</p>	

13.

<p>Submission relates to this specific part of alteration to NOR:</p>	<p>Conditions 10. Noise Mitigation Programme, clause 10.B. Preparation and Publication of the AANC.</p>
<p>Regarding this part, we support this alteration.</p> <p>For the following reasons. Dwellings will receive noise mitigation treatment when the 60 dB Ldn AANC reaches them, and prior knowledge will assist uptake and lessen hindrances.</p>	
<p>The recommendation sought is retain this provision.</p>	

14.

<p>Submission relates to this specific part of alteration to NOR:</p>	<p>Conditions 10. Noise Mitigation Programme, clause 10.C. Temporary Noise Mitigation Programme</p>
<p>Regarding this part, we support this alteration (which deletes this old provision.)</p> <p>For the following reasons. Provided for better elsewhere.</p>	
<p>The recommendation sought is retain this provision, i.e. deletion of the old clause 10C.</p>	

15.

<p>Submission relates to this specific part of alteration to NOR:</p>	<p>Aircraft Noise Mitigation Fund. Conditions 12 and 12A</p>
<p>Regarding this part, we support this alteration in principle.</p> <p>For the following reasons. Updating the annual contribution is welcome, but the amount proposed does not cover inflation since the previous amendment. An amount of \$340,000 to \$350,000 is more in line</p>	

with inflation.

The recommendation sought is the amount specified is amended to fully account for inflation.

16.

Submission relates to this specific part of alteration to NOR:	Conditions 13 Engine Testing on Aircraft, sub-clause a.
Regarding this part, we wish amendment:	
For the following reasons. Existing provision provides for measurement standard, but this is not an assessment standard which is essential. Amendment will render clause consistent with condition 13A.	
The recommendation sought is amend this provision as follows: In the paragraph under the table in sub-clause a, add after "sound" additional condition "and assessed in accordance with NZS 6802:2008 Acoustics-Environmental Noise"	

17.

Submission relates to this specific part of alteration to NOR:	Conditions 13A Other noise.
Regarding this part, we support this alteration i.e. deletion of "Maximum".	
For the following reasons. Old heading was misleading as implied L_{Amax} levels only applied.	
The recommendation sought is retain this provision.	

Appendix 1 - Auckland Regional Public Health Service

Auckland Regional Public Health Service (ARPHS) provides public health services for the three district health boards (DHBs) in the Auckland region (Counties Manukau Health and Auckland and Waitemata District Health Boards).

ARPHS has a statutory obligation under the New Zealand Public Health and Disability Act 2000 to improve, promote and protect the health of people and communities in the Auckland region. The Medical Officer of Health has an enforcement and regulatory role under the Health Act 1956 and other legislative designations to protect the health of the community.

ARPHS' primary role is to improve population health. It actively seeks to influence any initiatives or proposals that may affect population health in the Auckland region to maximise their positive impact and minimise possible negative effects on population health.

The Auckland region faces a number of public health challenges through changing demographics, increasingly diverse communities, increasing incidence of lifestyle-related health conditions such as obesity and type 2 diabetes, infrastructure requirements, the balancing of transport needs, and the reconciliation of urban design and urban intensification issues.