

Additional Topic¹ Allocation Form

Submitter name	Auckland International Airport
Submission number	870
Further submission number	312
Date	23 March 2023

This form is to be completed by submitters who wish to have their submissions allocated to additional hearing topics. Please use the [Guide to creating topic and subtopic parties lists](#) to determine your current hearing topics.

You must send your Additional Topic Allocation Form (Form) to the Hearing Advisor npsudhearings@aucklandcouncil.govt.nz, as soon as possible or no later than 10 working days before the council's evidence is due.

On receipt of your Form, the Independent Hearing Panel (IHP) chair will determine whether to allow the request.

The IHP will make all Forms and its decision available on the Independent Hearing Panel webpage.

Note: Submitters will retain allocation of original hearing topics whether or not the chair grants the request.

Additional Topic Allocation Criteria

The allocation request will only be permitted where:

- The primary submission is directly 'on' the requested topic, or if indirectly 'on' the requested topic reasons are to be provided why the additional allocation should be granted.
- The requested topic has not already been heard.
- The request is received no later than 10 working days prior to the council evidence exchange for the hearing topic (generally 25 working days before the hearing)
- The decision is consistent with the principles set out in [IHP Hearing Procedures](#) document dated December 2022 and any other Panel document.

Please complete the table(s) below:

¹ Topic in this context means topic or subtopic depending on specificity of the request.

Request 1

Submission point number (if any)	Various submission points, including 870.7 and 870.19 - 27.
Requested topic allocation	014 Height
Requested subtopic allocation	Policy Principles (NPS-UD Policy 3b and 3c – at least 6 storeys), Technical Elements, Strategic Approach)
Reasons	Auckland Airport has sought various amendments to zone provisions, including objectives and policies, regarding building height in order to ensure built development does not conflict with the Airport's Obstacle Limitation Surface and the number of people exposed to aircraft noise is managed. This is directly relevant to Policies 3(b) and 3(c) of the NPS-UD. While Auckland Airport supports the Council's existing allocation of its submission points, given the broad nature of the topics and potential overlap in terms of content, Auckland Airport also considers it is necessary that its submissions be allocated to this topic.
Text of submission 'on' the topic	Refer to Auckland Airport's submissions on the Metropolitan Centre, Local Centre and Neighbourhood Centre zones. For example, submission 870.19 provides: <i>"Within the Aircraft Noise Overlay, there are areas zoned Metropolitan Centre Zone. The Aircraft Noise Overlay seeks to manage the number of people that are exposed to aircraft noise through density and zoning controls on ASAN. While Auckland Airport is not concerned with height of activities that are not ASAN (provided these do not conflict with the Airport's Obstacle Limitation Surface), it may be appropriate to reduce the height of buildings containing ASAN (such as residential activities) within metropolitan centres to manage the number of people exposed to aircraft noise. Auckland Airport supports the addition to the H9.1 Zone description which recognises increased density of form and building heights enabled by PC78 can be reduced where a qualifying matter applies."</i>

Request 2


Submission point	870.18
Requested topic allocation	015 – Mixed Housing Urban zone provisions 015 - Terrace Housing and Apartment Buildings zone provisions
Requested subtopic allocation	All subtopics
Reasons	Auckland Airport has sought to rezone areas of Mixed Housing Urban and Terrace Housing and Apartment Building zone within the Aircraft Noise Overlay to Low Density Residential zone. However, to the extent that the rezoning is not adopted, Auckland Airport has an interest in the drafting of the provisions in this zone to ensure that they adequately recognise qualifying matters.

Text of submission 'on' the topic	"Auckland Airport opposes the current drafting of the objectives and policies of the MHU and THAB zones (insofar as these zones are proposed to apply in areas within the HANA and MANA) as these provisions do not adequately address the need for lower density development where qualifying matters apply, such as the Aircraft Noise Overlay. Auckland Airport seeks to address this through the removal of this zoning within the HANA and MANA and application of the LDR zoning."
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Request 3

Submission point	Various submission points, including 870.22 - 27
Requested topic allocation	019 Centres - NPS-UD Policy 3d response
Requested subtopic allocation	019A Town/Local/Neighbourhood – Methodology (centre selection) 019A Town/Local/Neighbourhood – Methodology (distance of adjacent)
Reasons	Auckland Airport has sought various amendments to zone provisions, including objectives and policies, regarding building height in order to ensure that built development does not conflict with the Airport's obstacle limitation surface and manage the number of people exposed to aircraft noise. Auckland Airport therefore has interests in the application of Policy 3(d) and building heights and densities within centres that are located near the Airport. While Auckland Airport supports the existing allocation of its submission points to the relevant zone provisions, given the broad nature of the topics and potential overlap in terms of content, Auckland Airport also considers it is necessary that its submissions be allocated to this topic.
Text of submission 'on' the topic	Refer to Auckland Airport's submissions on the Local Centre and Neighbourhood Centre zones. For example, submission 870.19 provides: <i>"Within the Aircraft Noise Overlay, there are areas zoned Metropolitan Centre Zone. The Aircraft Noise Overlay seeks to manage the number of people that are exposed to aircraft noise through density and zoning controls on ASAN. While Auckland Airport is not concerned with height of activities that are not ASAN (provided these do not conflict with the Airport's Obstacle Limitation Surface), it may be appropriate to reduce the height of buildings containing ASAN (such as residential activities) within metropolitan centres to manage the number of people exposed to aircraft noise. Auckland Airport supports the addition to the H9.1 Zone description which recognises increased density of form and building heights enabled by PC78 can be reduced where a qualifying matter applies."</i>

You are welcome to attach additional pages if more space is required.

Panel Decision – if granted in part, please specify below.			
Granted	✓	Declined	Date: 12 April 2023 Signature: 

Reason:

The requested topics have not been heard. The requests were received more than 10 working days prior to the council's exchange of evidence.

Request 1 is Granted submission points 870.5, 870.18, 870.19, 870.20, and 870.21 are additionally allocated to topics 014A Height – Business Height – Policy Principles, 014B Height – Business Height – Strategic Approach, and 014C Height – Business Height - Technical Elements, 014G Height - Residential Height - Policy Principles, 014H Height - Residential Height - Strategic Approach, 014I Height - Residential Height - Technical Elements intensification response as they are 'on' the topics.

Request 2 is Granted submission point 870.18 is additionally allocated to topics 015D Residential – Mixed Housing urban zone and 015E Residential – Terrace Housing and Apartment Building zone, as it is 'on' the topic.

Request 3 is Granted submission points 870.18, 870.24, 870.27, 870.30 is additionally allocated to topics 019A Centres (3d response) methodology (centre selection and distance of adjacent) and 019B Centres (3d response) extent of intensification, as they are 'on' the topic.

The reasons for granting the requests are related and are addressed together.

Paragraphs 3.1, 3.2, 3.3, and 3.8 provides the broad framework underlying the substance of the submitter's concerns – namely managing reverse sensitivity effects on the operation of large-scale/ strategic infrastructure such as Auckland International Airport. The submission identifies a causal nexus between PC78's enabled intensification and the potential for increasing reverse sensitivity effects as well as potential adverse health effects from increasing the amount of people exposed to aircraft noise.

Annexure A of the submission seeks relief relating to appropriateness of reducing height to accommodate certain qualifying matters/justify reducing development to reflect reverse sensitivity concerns. It also identifies the importance of acoustic controls and the minimisation of intensive housing development as a means of controlling the amount of people exposed to aircraft noise. Taken together, while the relief is not explicit, it is reasonable to see the submission as addressing PC78's application of height/density as it relates to the management of reverse sensitivity effects/potential health effects from the exposure of aircraft noise.

Therefore, it is 'on' the topics because the matters addressed by Topics 014 (broadly being height for centres), 015 (residential provisions), and 019 (broadly being increasing density and height around lower order centres) also address the management of the resource management issues identified in the submission.