

PROPOSED GORE DISTRICT PLAN SECTION 32 REPORT

AIRPORT ZONE



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Glossary of Terms

Resource Management Act 1991	RMA or 'the Act'
Gore District Council	GDC or 'the Council'
Operative District Plan	ODP
Proposed District Plan	PDP
National Planning Standards 2019	PS
Southland Regional Policy Statement 2017	RPS
National Policy Statements	NPS
National Policy Statement on Highly Productive Land	NPS-HPL
National Policy Statement for Urban Development	NPS-UD
National Environmental Standards	NES
National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011	NES-CS

1. Executive Summary

Section 32 of the Resource Management Act 1991 ('the Act' or 'the RMA') requires objectives in plan change proposals to be examined for their appropriateness in achieving the purpose of the Act. The policies and methods of those plan change proposals must be examined for their costs, benefits, efficiency, effectiveness, and risk in achieving the objectives. The analysis set out in this report is to fulfil the obligations of the Council under Section 32 of the Act.

The Gore District contains two airfields which contribute to the economic and social wellbeing of the district and regional community. These are Mandeville Airfield and the Gore Airport. The Gore Airport is an important transportation asset to the Gore District and wider Southland region, particular for the agricultural aviation industry and its contribution to productive farming.

This Section 32 report relates to the evaluation of options for the management of the Gore Airport, noting the management of the Mandeville Airfield is addressed through a precinct within the Settlement Zone¹. Objectives, policies, rules, and standards for managing the site is located within Part 3 – Special Zone – Airport Zone, as required by the National Planning Standards (PS).

The site is located within the Rural Zone under the Operative District Plan (ODP) and the relevant provisions do not specifically provide for aviation activities.

The Proposed District Plan (PDP) provisions aim to recognise the unique nature of the Gore Airport, and reflect appropriate policy to enable aviation, and associated activities, to continue and expand within the boundaries of the zone. The provisions aim to manage adverse effects from the Gore Airport on the adjoining community and wider environment.

2. Overview and Purpose

2.1 Introduction to the resource management issue(s)

The purpose of the Airport Zone is to enable and support the operation of the Gore Airport (also known as the Charlton Aerodrome and Gore Airfield) that is located approximately 8 kilometres south of Gore, on State Highway 1. It occupies approximately 40 hectares and is owned by the Gore District Council (GDC).

The Gore Airport comprises three grass runways, a range of aircraft hangars and associated buildings. The main runway is 1,270m long, with two shorter crossing runway vectors. The airport also includes fuel refilling services.

The Gore Aero Club operates from the site and offers flying instruction. Two aerial fertiliser spreading companies also operate from the airport.

The Airport Zone provides a regulatory framework for activities currently occurring at the site and to control associated effects. The provisions seek to manage the following issues:

- 1 The Operative District Plan does not recognise the unique nature of this site or provide for the land use activities occurring there.
- 2 The airport should be recognised as an asset to the Gore District as an important agricultural aviation resource.

¹ The Mandeville Aviation and Rail Precinct contained within the Settlement Zone in the Proposed District Plan

- 3 The airport should be able to expand within the parameters of the zone, whilst ensuring adverse effects on the environment and the wider community are avoided, remedied, or mitigated.

2.2 Purpose of the report

The purpose of this report is to provide an evaluation of the proposed provisions in accordance with the requirements of Section 32 of the RMA 1991.

The PDP includes Area Specific Chapters relating to Special Zones, consistent with the requirements of the National Planning Standards. It contains objectives, policies, rules, and standards to make provision for the activities currently occurring on site, while managing the potential adverse effects.

This report provides information on the issues the plan provisions seek to address. It assesses the appropriateness of the proposed objectives, to achieve the purpose of the Act and the effectiveness and efficiency of the policies, rules and standards which give effect to the objectives. An evaluation of the provisions relating to the Airport within the ODP have been undertaken, noting the site is currently zoned as “Rural”, with the airport operating under both existing use rights and approved resource consents.

An assessment of the scale and significance of the provisions will inform the level of detail included in this report.

3. Statutory and Policy Context

3.1 Resource Management Act

In carrying out a Section 32 analysis, an evaluation is required of how the proposal achieves the purpose and principles contained in Part 2 of the RMA.

Section 5 sets out the purpose of the RMA, which is to promote the sustainable management of natural and physical resources.

Sustainable management means *managing the use, development, and protection of natural and physical resources to enable people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety, while –*

- (a) *sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
- (b) *safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
- (c) *avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

In achieving this purpose, authorities also need to recognise and provide for the matters of national importance identified in Section 6, have particular regard to other matters referred to in Section 7 and take into account the principles of the Treaty of Waitangi referred to in Section 8.

Section 6

Section 6 of the RMA specifically requires that the Council recognises and provides for matters of national importance. No Section 6 matters are specifically relevant to the airfield, although it is acknowledged that any new airport infrastructure or improvements to existing infrastructure would need to be provided for in a way that is consistent with Section 6 of the RMA.

Section 7

The Section 7 matters that are relevant to this topic are:

- (a) kaitiakitanga:
- (b) the efficient use and development of natural and physical resources:
- (ba) the efficiency of the end use of energy:
- (c) the maintenance and enhancement of amenity values:
- (f) maintenance and enhancement of the quality of the environment:
- (i) the effects of climate change:
- (j) the benefits to be derived from the use and development of renewable energy.

The above matters are of particular relevance when ensuring the transport network, and more specifically the airport (being a physical resource) is operated, maintained, and developed safely and efficiently, and maintains or enhances surrounding amenity values within the District.

In relation to Section 7(b), the proposed Airport Zone is located on land previously zoned rural and therefore has the potential to affect the efficient use of productive land. The nature of the activities has the potential to affect the efficient use of the transport network being a physical resource.

In relation to Sections 7(c) and 7(f), the proposed Airport Zone could have positive or adverse effects on amenity values given the activities undertaken there may generate noise, light spill, and traffic. The activities may also impact on the quality of the environment, especially given the rural character of the surrounding land.

Section 8

Section 8 of the RMA requires the district council to consider the principles of the Treaty of Waitangi (Te Tiriti o Waitangi). Tangata whenua, through iwi authorities have been consulted as part of the district plan review process. This feedback has informed the Section 32 evaluation and the development of the zone chapter. The obligation to make informed decisions based on that consultation is noted.

Section 31

The RMA sets out in Section 31 the functions of territorial authorities. The key function for the district council is the integrated management of the use, development, or protection of land and associated natural and physical resources of the Gore District. When referring to “natural and physical resources” the RMA includes land, water, air, soil, minerals, and energy, all forms of plants and animals (whether indigenous to New Zealand or introduced), and all buildings and structures.

Ensuring that natural and physical resources and energy are used efficiently, while enabling people’s wellbeing and safeguarding the life supporting capacity of the environment, is part of the purpose of the RMA. Territorial functions under the RMA include integrated management of use and development. Since 2005, district councils are required to give effect to regional functions that include the strategic integration of infrastructure and land use.

Section 31 is relevant insofar as it requires the Council to establish, implement and review a District Plan which contains objectives, policies, and methods to achieve a range of purposes as listed above. This report considers the appropriateness of the new objectives within the PDP to achieve the purpose

of the Act. The review of the Operative District Plan and the establishment of a new District Plan allows Council to give effect to Section 31.

Section 326

Section 326 addresses the meaning of 'excessive noise', which means any noise that is under human control and of such a nature as to unreasonably interfere with peace, comfort, and convenience of any person (other than a person in or at the place from which the noise is being emitted), but does not include any noise emitted by:

- aircraft operated during, or immediately before or after, flight;
- vehicles driven on a road (within the meaning of section 2(1) of the Land Transport Act 1998); or
- trains, other than when being tested (when stationary), maintained, loaded, or unloaded.

3.2 National Policy Statements

The Section 32 - Overview and Urban Form and Development Evaluation Report includes details and a brief assessment of all National Policy Statements (NPS). The following NPS are relevant to the Airport Zone:

The National Policy Statement on Highly Productive Land (NPS-HPL)

The National Policy Statement on Highly Productive Land (NPS-HPL) became operative on 17 October 2022. The NPS-HPL seeks to ensure that the most favourable soils for food and fibre production are protected now and for future generations. Environment Southland is required to map highly productive land within the Gore district that meets the following criteria:

- (a) is in a general rural zone or rural production zone; and*
- (b) is predominantly LUC 1, 2, or 3 land; and*
- (c) forms a large and geographically cohesive area.*

The NPS-HPL is applicable to the Gore Airport land because under the ODP this area is zoned Rural and contains highly productive soils, specifically Land Use Capability (LUC) Class 1 soil. It is therefore considered that the area to be rezoned for the airfield would meet Section 3.4(1) of the NPS-HPL.

Under Section 3.6(4) Territorial Authorities which are not Tier 1 or 2 (Gore is a Tier 3 Council) may allow urban rezoning of highly productive land only if:

- (a) the urban zoning is required to provide sufficient development capacity to meet expected demand for housing or business land in the district; and*
- (b) there are no other reasonably practicable and feasible options for providing the required development capacity; and*
- (c) the environmental, social, cultural, and economic benefits of rezoning outweigh the environmental, social, cultural, and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.*

It is noted that the Airport Zone is not an urban rezoning, the proposed Airport Zone has been designed to reflect the existing activities that have been located and operating on site since 1962. The Airport provides an important recreational and agricultural service on a day to day basis as well as providing aviation emergency services when required. Without providing suitable zoning for this

service to continue there could be adverse effects on the economic, social, and cultural well-being of the community. Airfield services could look to establish outside of the district, to the detriment of the existing community and economy. The productive use of land, in general, could also be negatively impacted without the benefits of the proximity of the airfield for agricultural aviation services such as the application of agrichemicals and fertilisers.

All reasonable options have been considered as alternatives, however as the proposed zoning seeks to provide for the existing activities on site, this zoning will not result in any practical reduction in productive soil. The benefits from the proposed area identified for the Gore Airport are considered to outweigh the technical loss of highly productive land for land-based primary production purposes. It is noted that the majority of land within the Gore District that is physically suitable for an airfield is also identified as highly productive soil, therefore no reasonable alternatives exist, and the continued use of the Gore Airfield, as a support for the agricultural aviation industry to support primary production within the district, is considered appropriate.

National Policy Statement on Urban Development 2020

The Gore District is a Tier 3 Council under the NPSUD, and the combined urban areas of Gore and Mataura fulfil the requirements for an Urban Environment as defined by the NPSUD.

NPSUD objectives and policies include the need to ensure decisions integrate infrastructure planning with funding, support urban environments that reduce greenhouse gas emissions, and are resilient to current and future effects of climate change. Urban environments have good accessibility for all people between jobs, housing, community services, natural and open space, including public or active transport. The density of urban form needs to be commensurate to the level of accessibility by existing or planned active or public transport, and the relative demand for housing and business use. While the Gore Airport does not provide for active or public transportation, it does provide a useful transportation service for the District (agricultural aviation), while avoiding the need for additional travel to a larger airport service such as Invercargill.

3.3 National Environmental Standards

The Section 32 - Overview and Urban Form and Development Evaluation Report includes details and a brief assessment of all relevant National Environmental Standards (NES).

The NES for Assessing and Managing Contaminants in Soil to Protect Human Health 2011(NES-CS) has some relevance to the Airport Zone. A large portion of the existing airfield is identified as potentially contaminated through the Environment Southland Contaminated Sites Register². There is a greater likelihood that aviation activities will be or will become part of Environment Southland's Hazardous Activities and Industries List (HAIL) due to the nature of the activities enabled within the zone. The NES-CS is a nationally consistent set of planning controls and soil contaminant values. It ensures that land affected by contaminants in soil is appropriately identified and assessed before it is developed.

3.4 National Planning Standards

The National Planning Standards (PS) 2019 require a more bespoke approach to planning zones than the current ODP. This includes a clearer centre hierarchy, rural settlement zones, and a wider range of residential, industrial, and rural zones. The PS also provide the structure and form for the Plan content along with definitions and mapping criteria.

² <https://maps.es.govt.nz/index.aspx?app=contaminated-sites-register>

The following aspects of the National Planning Standards are relevant to the Airport Zone:

- The National Planning Standards require that this chapter be included in the Part Three – Area Specific Matters of the proposed plan and be referred to as the “Airport Zone” which is described as follows:
“Areas used predominantly for the operation and development of airports and other aerodromes as well as operational areas and facilities, administrative, commercial and industrial activities associated with airports and other aerodromes.”
- The Airport Zone has a unique identifier: AIRPZ – Airport zone.
- A definition of “Network Utility Operator” is also provided within the NPS and includes a sub-definition of “Airport Authority”:

“Network Utility Operator: has the same meaning as in s166 of the RMA (as set out in the box below)

means a person who -

*(g) is an airport authority as defined by the Airport Authorities Act 1966 for the purposes of operating an airport as defined by that Act; or
is a provider of any approach control service within the meaning of the Civil Aviation Act 1990;”*

- Mandatory directions are provided for any plan rule to manage noise emissions, specifically, Noise and Vibration Metric Standard:
 - New Zealand Standard 6805:1992 Airport noise management and land use planning – measurement only

Section 15 of the PS requires that any plan rule to manage noise emissions must be in accordance with the mandatory noise measurement methods and symbols in the applicable New Zealand Standards being:

- New Zealand Standard 6805:1992 Airport noise management and land use planning – measurement only

Noise is managed through the Noise Chapter in accordance with the PS.

3.5 Regional Policy Statement

The Southland Regional Policy Statement 2017 (RPS) sets out the framework and priorities for resource management in the region. The RPS identifies the regionally significant issues around the management of the region’s natural and physical resources and sets out what needs to be achieved (objectives) and the way in which the objectives will be achieved (policies and methods). The PDP is required to give effect to the regional policy statement by Section 75(3) of the RMA.

Relevant provisions include:

- Chapter 12: Hazardous Substances
- Chapter 15: Infrastructure/ Transport
- The RPS also identifies the Gore Airport as regionally significant transport infrastructure and a strategic facility.

Chapter 12 – Hazardous Substances:

Chapter 12 of the RPS relates to hazardous substances and identifies the resource management issues associated with hazardous substances:

“Adverse effects on the environment (including human health and safety) may arise from the storage, use, transportation and disposal of hazardous substances.”

The issue is address by an objective and seven policies. The policies relate to:

- hazardous substance storage facilities and containers
- accidents involving hazardous substances
- transportation of hazardous substances
- disposal of hazardous substances\
- alternatives to hazardous substances
- improvement of knowledge
- new contaminated land

Method HAZ.2 – District Plans requires territorial authorities to:

“Consider establishing and maintaining provisions in district plans to control the use of land for activities that store, use, transport, or dispose of hazardous substances, to avoid, remedy or mitigate adverse effects and manage risks from the storage, use, transportation, and disposal of hazardous substances, including on:

(a) other land use activities;

(b) the health and safety of the community;

(c) amenity values, and community and tangata whenua resources, cultural and spiritual values.”

Chapter 15 – Infrastructure/ Transport

Chapter 15 of the RPS specifically focuses on Infrastructure and Transport. The RPS identifies that transport infrastructure such as road, rail, airports and seaports are significant physical resources. This infrastructure enables communities to provide for their social, economic, and cultural wellbeing and their health and safety. Moreover, the importance of effective regionally significant infrastructure for the functioning of communities at the national, regional, and local scale is highlighted.

The RPS also specifies that there are opportunities to improve energy efficiency through the efficient design, location, and function of development. In particular, minimising energy use, promoting healthier transport options and providing for the efficient use of existing infrastructure.

The general infrastructure objectives and policies relate to the essential function of regional, national, and critical infrastructure to enable the wellbeing, health and safety of people and communities. They are tabulated below.

Objective	
INF.1 – Southland’s infrastructure	Southland’s regionally significant, nationally significant, and critical infrastructure is secure, operates efficiently, and is appropriately integrated with land use activities and the environment.
Policies	

INF.1 – Regional, national, and critical infrastructure	Recognise the benefits to be derived from, and make provision for, the development, maintenance, upgrade and ongoing operation of regionally significant, nationally significant, and critical infrastructure and associated activities.
INF.2 – Infrastructure and the environment	Where practicable, avoid, remedy, or mitigate the adverse effects of infrastructure on the environment. In determining the practicability of avoiding, remedying, or mitigating adverse effects on the environment, the following matters should be taken into account: (a) any functional, operational, or technical constraints that require the physical infrastructure of regional or national significance to be located or designed in the manner proposed; (b) whether there are any reasonably practical alternative designs or locations; (c) whether good practice approaches in design and construction are being adopted; (d) where appropriate, and such measures are volunteered by a resource user, whether any significant residual adverse effects can be offset or compensated for; and (e) the need to give effect to the NPSET (2008) including that planning and development of the transmission system should seek to avoid adverse effects on outstanding natural landscapes, areas of high natural character and areas of high recreation value and amenity and existing sensitive activities.
INF.3 – Infrastructure protection	Protect regionally significant, nationally significant, and critical infrastructure, particularly from new incompatible land uses and activities under, over or adjacent to the infrastructure.
INF.4 – Natural hazards	The risks to infrastructure from natural hazards and climate change effects are avoided, remedied, or mitigated including through design and construction.
INF.5 – Development, subdivision, and land use	Management of development, subdivision and land use shall ensure: (a) development does not result in adverse effects on the efficient operation, use, maintenance, and development of infrastructure; (b) the nature, timing and sequencing of new development is coordinated with the development, funding, implementation, and operation of infrastructure, as appropriate for the type of development being undertaken;

	(c) the efficient and effective functioning of infrastructure, including the ability to develop, maintain, remove, decommission, and upgrade infrastructure, is retained; (d) a coordinated and integrated approach across regional and district boundaries, and between agencies.
INF.6 – Promoting consistent and integrated management of infrastructure across the region	Provide for the integrated management of the region's infrastructure by: (a) recognising the interconnected nature of natural and physical resources; and (b) promoting a collaborative and consistent approach to managing infrastructure, particularly infrastructure networks that crosses zone and/or territorial boundaries.

Local authorities are required to:

Include objectives, policies and methods in district plans that will:

- (a) enable the development, use, maintenance and upgrading of infrastructure, whilst ensuring the management of any associated adverse effects;
- (b) help ensure that the nature, timing, and sequencing of new development is coordinated with the development, implementation, and operation of infrastructure, as appropriate for the type of development being undertaken;
- (c) ensure that adverse effects, including reverse sensitivity effects, of development and land use on existing and/or planned regionally and nationally significant infrastructure are avoided, remedied, or mitigated by identifying:
 - (i) what activities and development may be incompatible with this infrastructure; and
 - (ii) how this infrastructure should be protected from such activities;
- (d) promote the efficient and effective use of infrastructure;
- (e) take into account the potential adverse effects of natural hazards and climate change on infrastructure;
- (f) facilitate long-term planning for investment in infrastructure and its integration with land uses.

The specific Transport objectives and policies relate to the coordination and integration of land use and transport infrastructure and are listed below.

Objective	
TRAN.1 – Transport and land use	Development of transport infrastructure and land use take place in an integrated and planned manner which: (a) integrates transport planning with land use; (b) protects the function, safety, efficiency, and effectiveness of the transport system;

	(c) minimises potential for reverse sensitivity issues to arise from changing land uses; (d) provides for positive social, recreational, cultural, and economic outcomes; (e) minimises the potential for adverse public health and environmental effects; (f) enhances accessibility and connectivity, maximising transport choice for users of the transport system.
Policies	
TRAN.1 – Transport decision making	Strategic decision making processes relating to the transportation network shall be undertaken in a collaborative manner between local authorities, key stakeholders, and the community.
TRAN.2 – Strategic planning	Develop and maintain, in collaboration with local authorities, key stakeholders and the community, a strategic transportation network plan or other appropriate strategic transport planning tool, for Southland that provides for existing and future transport requirements.
TRAN.3 – Integration of existing and future transport infrastructure	Integrate land use planning with transport infrastructure planning and make provision for future transportation requirements.
TRAN.4 – Protection of health and environmental values	Manage transport activities to avoid, remedy or mitigate adverse effects on public health and environmental values.

Local authorities are required to:

Include objectives, policies, and methods in district plans which:

- (a) identify existing and proposed strategic transport infrastructure;
- (b) make provision for the establishment and continuing operation and maintenance of transport infrastructure;
- (c) avoid, remedy, or mitigate the adverse effects, including reverse sensitivity, on transport infrastructure arising from subdivision, use and development of land;
- (d) ensure the safe and efficient operation of the transport network is not adversely affected by subdivision, land use and development;
- (e) avoid, remedy, or mitigate the adverse effects of transport infrastructure and associated activities on the environment;
- (f) make provision for development which enables all transport modes to be well connected and provides for public transport, walking and cycling;
- (g) ensure public health and environmental values are considered;

(h) promote the use of energy efficient transport modes and technologies.

Local authorities are also encouraged to:

- Identify the strategic land transport network in the Southland Regional Land Transport Strategy.
- Promote, inform, and encourage the farming industry and transport operators to adopt good practices, including the avoidance of stock effluent being deposited on roads during transportation.
- Apply a regionally consistent and coordinated approach to the development, establishment, operation, maintenance, and upgrade of local, regional, and national infrastructure.
- Work collaboratively with road controlling authorities, infrastructure providers, the Southern District Health Board, contractors, affected landowners, and tangata whenua during transport decision making processes and when developing strategic transportation documents and to identify an appropriate buffer area or corridor for sensitive activities.
- Monitor and report the environmental effects of infrastructure, development, maintenance, and operation.

Overall the RPS directs that infrastructure operates efficiently and is protected and provided for while managing any adverse effects. District councils need to provide for these matters in the development of any District Plan, including in relation to airports.

3.6 Regional Plans

Otago Southland Regional Land Transport Plans 2021-2031

The Otago and Southland Regional Transport Committees have produced the Otago Southland Regional Land Transport Plans 2021-2031. The two regions have combined their plans into a single document, which proposes both strategy and investment for the two regions' transport networks.

The plan set the strategic direction for land transport in Otago and Southland with the goal of providing a safe and sustainable transport system that supports and enhances regional development. This acts as the application method for national transport funding.

Strategic objectives relate to road safety, asset condition, connectivity and choice and environmental sustainability.

Proposed Southland Water and Land Plan January 2021

The Proposed Southland Water and Land Plan contains broad region-wide objectives, policies and rules relating to land and water which are relevant to the operation and development of an airport. This includes in relation to stormwater and wastewater discharges. The plan also contains objectives, policies and rules in relation to hazardous substances and contaminated land which are relevant to the airport as an activity that involves the use of hazardous substances and works on contaminated land.

3.7 Iwi Environmental Management Plan(s)

'Te Tangi a Tauria – The Cry of the People' the Ngai Tahu Ki Murihiku Natural Resource and Environmental Management Plan identifies a broad range of relevant matters when considering where and how Gore grows and develops. In particular, there is a desire to:

- Limit the impacts of climate change on indigenous species and ecosystems and the risks of natural hazards by appropriately managing urban development and providing for sustainable energy and transport systems.
- Protect sites of significance and indigenous biodiversity areas along with appropriate management of water.
- Limit impacts of industrial activity and subdivision by involving iwi in decision making processes and managing land use, building and water issues.
- Provide appropriate infrastructure management.

‘Te Tāhū o Te Whāriki’, the Ngāi Tahu Climate Change Strategy, identifies a need to assess future commercial risks, protect wahi tapu, mahinga kai and other taonga, prepare plans to relocate Marae and Runānga facilities threatened by increasing hazards, as well as influence agencies to develop climate change responses.

3.8 Other Legislation and Policy Documents

The following national guidance documents are considered relevant to this topic:

- Contaminated Land Management Guidelines 2021

Compliance with the guideline is a legal requirement for activities undertaken under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NESC). It was developed to ensure consistency in reporting on contaminated site investigations.

- Civil Aviation Act 1990 and Airports Authorities Act 1966

The Civil Aviation Act 1990 governs New Zealand’s civil aviation system and sets the overall framework for aviation safety, security, and economic regulation. The Airport Authorities Act 1966 gives airport authorities a range of functions and powers to establish and operate airports. These acts have been reviewed and will be replaced with the Civil Aviation Act 2023, to come into force April 2025. The Civil Aviation Authority (CAA) manages risk in aviation, including education, guidance, and legislative tools under the Civil Aviation Act 1990.

3.9 Other Local Policies, Strategies and Plans

Spatial Plan, Ready for Tomorrow

In January 2020, the Council released a strategic planning document *Ready for Tomorrow – A Spatial Plan for the Gore District* seeking public feedback on potential growth options for the main urban areas in the district. In June 2020, the Council adopted the Spatial Plan. The document outlines the issues the Council considers important, possible future outcomes and opportunities for the district. The Spatial Plan also included the cumulation of various Council initiatives in recent years, in particular the 2018 program Ready for Growth strategy. This provided impetus locally, as a community lead development strategy, for applying the direction given by the Southland Regional Development Strategy at a District level. The Ready for Growth strategy overall objective is to grow the district population by 1,500 people by 2030. Through extensive community consultation, Ready for Growth has identified a comprehensive overview of the socio-economic conditions required to generate sustainable growth and opportunity across the District and provides an important strategic framework for the future. The airport is not specifically canvassed in the Spatial Plan, but is relevant as it provides

an overarching roadmap for growth in the district which is supported by the airport as a key piece of infrastructure.

Gore Subdivisions and Land Development Bylaw 2019

The Gore Subdivision and Land Development Bylaw 2019 contains references to contaminated land and directs that this needs to be managed under the NESCS. It also requires that soil used in developments shall require testing where it is from a site previously used for HAIL activities, noting that the NESCS would also apply in this situation. This is relevant to the airport as a site which requires consideration of the NESCS.

3.10 Climate Change

The effects of climate change have been added to 'other matters' decision makers should have particular regard to (RMAs7(i)).

In accordance with 2020 RMA amendments, by 2022 District Plans not only need to have regard to the effects of climate change (adaptation) but also climate change mitigation and national adaptation and emission reduction plans prepared under the Climate Change Response Act 2002. A compact urban form with most activities located around good transport connections, and that takes account of the changing nature of natural hazards, will help achieve these requirements.

The effects of climate change have been given regard to in respect of the Airport Zone in that the provision for airport policy enables the continued operation of the Gore Airport, rather than relying on more distant airfields such as the Invercargill Airport. The services provided by the Gore Airport such as agricultural aviation, are still required by the district. The provision of an airport does not encourage a move away from fossil fuel reliance, however while this aviation service is still utilised, a local option that avoids the need for additional transport is preferable from a climate change perspective.

4. Resource Management Issue Analysis

4.1 Background

Section 2.1 of this report identifies two resource management issues which the airport chapter provisions address:

1. The Operative District Plan does not recognise the unique nature of this site or provide for the land use activities occurring there.
2. The airport should be recognised as an asset to the Gore District as an important agricultural aviation resource.
3. The airport should be able to expand within the parameters of the zone whilst ensuring that zoned adverse effects on the environment and the wider community are avoided, remedied, or mitigated.

Issue 1: The Operative District Plan zoning does not specifically provide for the operation of an airport and instead relies on generic rural zoning and provisions within the transport chapter. The airport has so far operated under a mixture of existing use rights and resource consents, which does not give plan users, neighbours or the wider community certainty of anticipated activities and effects.

Issue 2: The Gore Airport is an important agricultural aviation resource for the Gore District. Recognition through zoning and district plan provisions allows for this resource to be formally acknowledged by the District Council, helping to recognise the underlying value of the airport to the community.

Issue 3: The site-specific zoning of the Gore Airport will enable growth within the zone boundaries to be supported and managed through the plan provisions. The current provisions do not support any airport future aspirations as an aviation resource for the Gore Community.

4.2 Operative Plan Approach

The Operative District Plan Zoning of the site is Rural, which includes objectives and policies within Chapter 3, land use rules within Chapter 4 and Transport specific rules within Chapter 5 of the ODP.

The rural zoning and district wide provisions do not specifically provide for any aviation activities, however Chapter 4 Land use Activities and Chapter 5 Transport do include the following provisions:

Chapter 4

Rule 4.5.1 (2) Exemptions on noise limits in rural and residential zones:

- j. to any land use activity or flight operations associated with use of the Charlton Aerodrome or the Mandeville Airfield*

4.8.3 Rule (Superimposed Approach Vectors)

- 1) On land within the Superimposed Approach Vectors for the Gore Aerodrome and Mandeville Airfield, no structure shall exceed the maximum height restrictions shown on Planning Maps Vec 01 and Vec 02.*
- 2) Any land use activity that does not comply with (1) above is a discretionary activity*

Chapter 5: Transport

Objective 5.3 (2) Maintain the sustainability of the land transportation routes and the Gore Aerodrome and the Mandeville Airfield.

Policy 5.4 (1) Control the adverse effects of land use activities on transportation networks.

The Operative District Plan is out of date and requires review to give effect to regional and national direction. Although the relevant objective and policy of the Transportation Chapter are generally consistent with some aspects of regional and national direction, they fall short in that they do not actually provide for the activity itself. The ODP does not have specific objectives, policies or rules providing for the use of the airport, aviation, or associated activities.

The Section 35 report into the effectiveness and efficiency of the operative plan has found that the Operative Plan provisions have been partially effective at managing transport in general within the region. However, given updated and projected development patterns and population data, as well as changes to both national and regional policy direction, there is a gap in current transport management that will need to be addressed through the Gore District Plan Review.

The Proposed District Plan is being developed in conjunction with the National Planning Standards to ensure regional and national consistency for land use planning. It aims to provide a clear and concise policy framework for managing this specific transportation activity.

4.3 Technical Reports and Research

Informal consultation was undertaken with the Gore Aero Club along with the exposure draft consultation period with the wider community and more specifically the agricultural aviation community who provided useful feedback on the needs of the airfield. No specific technical reports have been commissioned.

The Styles Group Acoustics & Vibration Consultants provided two reports³ in relation to the Noise Chapter provisions. The reports include recommendations for managing noise from aircraft and noise at the Airport from other operations.

The initial report in June 2023 was a review of the draft District Plan Noise Chapter and recommended inclusion of either an air noise boundary or a separation buffer around the airport to manage reverse sensitivity effects from aircraft noise. However, the second report in August 2023 concluded that there was insufficient information on airport operations to determine the extent of an air noise boundary. The report recommended three alternative options for managing noise from aircraft. Although one of the options did include a recommended separation buffer area around the airport this was not considered the most appropriate option due to the lack of information about the appropriateness of the extent of the buffer. The Section 32 Evaluation Report – Noise includes a summary of all options and explains the rationale for selecting the PDP option to managing noise at the airport both from operational activities and aircraft.

4.4 Analysis of Best Practice – how other Councils are addressing the same issue

To understand whether the PDP provisions in relation to the Airport Zone are appropriate and consistent with how other Councils are addressing the same issues the following District Plans were reviewed:

- Southland District Plan (Southland District Council borders Gore District Council to the north, south and east)

Southland District manages the Te Anau/ Manapouri Airport and flight paths through a designation system. While this does still provide for aviation activities, this is no longer considered a best practice approach as it does not align with National Planning Standards and lacks clarity and transparency for plan users.

- Proposed New Plymouth District Plan

The Proposed New Plymouth District Plan manages the New Plymouth Airport through a Special Zone, in accordance with the National Planning Standards. While the scale of this airport is much larger than that currently provided for within the Gore Airport, the same principle of management applies.

- Proposed Selwyn District Plan

³ Noise Chapter Review: Gore District Plan Review, Styles Group Acoustics & Vibration Consultants 9 June 2023 and Noise Chapter Review: Gore District Plan Review, Styles Group Acoustics & Vibration Consultants 2 August 2023

The Proposed Selwyn District Plan manages the West Melton Aerodrome, as a specific control area within the General Rural Zone. Development and operation is guided by an Outline Development Plan. In addition, provisions relating to the Aerodrome are managed through the Energy and Infrastructure Chapter.

Overall, there is very little consistency with the approach taken by other Councils to managing established aerodromes. However, in the plans reviewed, the overall outcome will be similar to the Proposed Gore District Plan. The Gore Airport will be specifically recognised and provided for in the plan provisions to enable the facility to operate and develop within the zone boundaries. This will avoid the need for tokenistic resource consents, existing use rights or unconsented activities. The Special Zone approach was considered preferable in this instance, supported by stakeholders and importantly consistent with National Planning Standard requirements.

5. Scale and Significance

5.1 Scale and Significance Evaluation

Section 32(1)(c) of the RMA requires that this report contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.

	Comments	Assessment		
		Low	Medium	High
Degree of change from the Operative Plan	New zone is proposed but is confined to the existing airport area.		x	
Scale of effects – geographically (local, district wide, regional, national).	The PDP recognises an existing situation, The effects are not considered to be widely changed by the new provisions.	x		
Effects on matters of national importance (s6 RMA)	No Section 6 matters are specifically relevant to the airfield, although it is acknowledged that any new airport infrastructure or improvements to existing infrastructure would need to be provided for in a way that is consistent with Section 6 of the RMA.	x		
Scale of effects on people (how many will be affected – single landowners, multiple landowners, neighbourhoods, the public generally, future generations?).	The PDP recognises an existing situation. The effects on people are not considered to be widely changed by the new provisions. Improvement is gained as the acceptable parameter for the activity will be outline in the new zone.	x		
Scale of effects on those with specific interests, e.g., Tangata Whenua	The PDP approach will have positive effects by providing certainty around the provisions relating to the airport for those with specific aviation interests such as users of the airport and businesses supported by aviation activity.		x	
Degree of policy risk – does it involve effects that have been considered implicitly or explicitly by higher order documents? Does it involve effects addressed by other	The PDP recognises an existing situation. The effects on people are not considered to be widely changed by the new provisions. Improvement is gained as the acceptable parameter for the activity will be outline in the new zone.	x		

	Comments	Assessment		
		Low	Medium	High
standards/commonly accepted best practice?				
Likelihood of increased costs or restrictions on individuals, communities, or businesses.	Should reduce costs as resource consents for anticipated activities will not be required.	x		

5.2 Evaluation Summary

The management of the Gore Airport is not substantially controlled through other planning documents such as regional plans, or through other legislation. Whilst there are a number of aviation and health and safety requirements, these are considered specific to the operational requirements of aircraft and will apply regardless of the district plan management of the airfield. As such these matters have not specifically been addressed through this assessment.

The PDP provisions recognise the existing land use of the Gore Airport and provide for airport specific provisions to manage effects and enable aviation and associated activities. The PDP provides the following:

- More specific objectives and policies.
- Clearer matters of discretion.
- Targeted rules to provide for and manage aviation and associated activities.

This addresses the issues by recognising the unique nature of this site and asset to the district and providing specific parameters for the airport to operate within.

Overall, the scale of significance is considered to be low, largely as the PDP provisions seek to reflect existing land use patterns. Therefore, the level of details provided within this evaluation is commensurate with the scale and significance of the environmental, economic, and cultural effects that are anticipated from the implementation of the provisions.

6. Consultation

6.1 Community and Stakeholder Engagement

During the preparation of the District Plan Review, the Council is required by Clause 3 of Schedule 1 of the RMA to consult with the Minister for the Environment; other Ministers of the Crown; local authorities who may be affected; and the mana whenua of the area through iwi authorities. The Council may consult anyone else during the preparation of a proposed policy statement or plan.

The Section 32 – Overview Evaluation Report provides an overview of the consultation undertaken to date in respect of the PDP. The PDP has been prepared in partnership with Hokonui Rūnanga who have reviewed and provided feedback on all chapters to ensure consistency with the Mana Whenua Chapter and that cultural values are appropriately integrated throughout the proposed provisions.

Feedback was received during the 2022 exposure draft of the plan from a number of stakeholders. The feedback received is summarised below:

Person / Organisation	Feedback summary	Response
House Movers Section of the New Zealand Heavy Haulage Association Inc	Requests a specific rule for relocated dwellings to be permitted subject to standards	This will be addressed through the temporary activities chapter
Fire and Emergency NZ	Support the provision of 'Emergency Services Facility' and activity status	No action requested
Clark Fortune McDonald & Associates	Supportive of provisions	No action requested
Feedback summary		
Generally supportive feedback, only relief sought was through the NZ Heavy Haulage Association who seek for the provision of specific rule relocated dwellings in all zones as a permitted activity subject to standards.		
Key changes in response to feedback		
The relief sought by the Heavy Haulage Association will be met through the Temporary Activities chapter and as such no changes are proposed to the Airport Zone from the submissions received.		

The Gore Aero Club also met with the District Plan review team. While no formal submission was received from this group they were supportive of the planning provisions in general for the airport. The Club did request the possibility of a mechanism to notify neighbouring landowners, both current and future, to be made aware of the existence of the airfield (particularly when purchasing property within proximity of the airport as the location may have potential impacts on amenity via nuisance effects associated with the airport activities).

Council Officers have considered this issue. An overlay over potentially impacted properties could achieve this, however it would need to be managing an effect to justify its inclusion in the plan. Additional objectives and policies and/or rules would also be required. Consequently this was not included. The noise assessment provided by Styles Group Acoustics & Vibration Consultants recommended a buffer could be established as another option to manage aircraft noise. However, other options were also suggested by Styles Group and following an evaluation of all options it was not considered that applying a buffer was the most appropriate option (refer to Section 4.3 of this report and the Section 32 Evaluation Report for Noise).

7. Proposed Plan Provisions

7.1 Strategic Direction

Objective UFD-O1 relates to general development and urban environments within the District and a further objective (UFD-O8) which seeks to specifically recognise the value of major facilities to the district. These objectives have relevance to the Gore Airport as a resource management issue.

Objective UFD-O1 seeks to ensure that the district develops in a cohesive, compact and structure manner, this includes managing adverse effects between incompatible activities and zones.

Objective UFD-O8 seeks to ensure that major facilities, are able to operate efficiently and effectively and the contribution they make to the economic wellbeing and prosperity of the district is recognised.

7.2 Objectives and Policies, Rules, Standards and Definitions

Objectives	
AIRPZ-O1	Activities within the Airport Zone support the functionality of the airfield and contribute positively to the economic sustainability and resilience of airfield and wider Gore District.
AIRPZ-O3	The <i>effects</i> arising from new or expanded activities within the Airport Zone are managed to minimise adverse <i>effects</i> on the amenity of adjacent <i>land</i> , and the underlying Ngāi Tahu relationships with the natural <i>environment</i> .
AIRPZ-O4	Ensure activities are undertaken within the Zone in a manner that provides for the security and safety of the public, occupiers of <i>sites</i> and <i>aircraft</i> operations.
Policies	
AIRPZ-P1	Recognise the Gore Airfield as a strategic asset in <i>Emergency Management</i> events.
AIRPZ-P2	Provide for a diverse range of <i>aviation activities</i> within the Airport Zone which support the economic sustainability of the airfield and the economic, cultural, and social needs of the community.
AIRPZ-P3	Design, locate and operate new activities and development within the Airport Zone in a manner which: 1. maintains amenity of existing activities within the zone or surrounding <i>sites</i>; and 2. avoids <i>reverse sensitivity effects</i> on existing activities within the zone or surrounding <i>sites</i>; and 3. manages servicing demands; and 4. responds to the underlying Ngāi Tahu relationships with the natural <i>environment</i>; and 5. protects river and stream values from inappropriate development.
AIRPZ-P4	Ensure all activities are designed and operated in a way that does not adversely affect the safety and functionality of the airfield or on adjoining and arterial <i>roads</i> .
AIRPZ-P5	Avoid activities which may compromise the purpose of the Airport Zone and generate <i>reverse sensitivity effects</i> or the ability to use <i>land</i> for aviation purposes unless those activities are ancillary to <i>aviation activities</i> .
AIRPZ-P5	Close those portions of Jubilee Avenue adjacent to areas occupied or utilised by operators at the Gore Airfield.
AIRPZ-P6	Enable activities and facilities that: 1. are consistent with the intended purpose, character, and qualities of the Airport Zone; and 2. Support the agricultural aviation of the district; and 3. contribute to the overall health and wellbeing of the community; and 4. minimise adverse effects on the character and amenity values of the surrounding area.

Rules

There are nine permitted activity rules which give effect to the Objectives and Policies, noting these are all subject to standards:

- Aviation Activity
- Industrial Activity
- Emergency Service Facility
- Conference Facility
- Ancillary aviation activities:
 - Office Activity
 - Food and Beverage Activity
 - Retail Activity
 - Residential Activity
 - Visitor Accommodation

All other activities not listed above are assessed as non-complying activities

Standards

- Outdoor storage of goods and materials – None within the airstrip, they must be screened from roads, and a maximum 2m height
- Height – 12m + approach vectors
- Setbacks – 6m
- Setbacks to streams and rivers – 20m, 10m, 5m depending on river and stream order

Definitions

Agricultural aviation activity - Means the use of aircrafts or helicopters used ancillary to and in association with primary production and / or conservation activity.

Aircraft - Has the same meaning as per the Resource Management Act - aircraft means any machine that can derive support in the atmosphere from the reactions of the air otherwise than by reactions of the air against the surface of the earth.

Airport - Has the same meaning as per the Resource Management Act - airport means any defined area of land or water intended or designed to be used, whether wholly or partly, for the landing, departure, movement, or servicing of aircraft.

Aviation activity - Means the use of land and / or buildings for commercial and non-commercial activities associated with aircraft operation, maintenance, navigation and / or education, including: aircraft landing, take off and taxiing; airport freight, luggage and passenger facilities; airport navigational, control and safety equipment; aviation education, training and recreational facilities and activities; maintenance, servicing and manufacturing of aircrafts and associated parts; refuelling of aircrafts; warehouse and storage.

Rural airstrip - Means any area of land in the rural environment intended or designed to be used, whether wholly or partly, for aircraft movement or servicing, excluding helicopters.

Rural industry - Has the same meaning as per the National Planning Standards - means an industry or business undertaken in a rural environment that directly supports, services, or is dependent on primary production.

Vintage aviation and transport activity - Means the use of land and buildings for the preservation, operation and display of aircrafts, rail vehicles, motorcars and motorcycles, steam machines and other transport modes and associated ancillary activities and infrastructure.

8. Evaluation of Objectives

This section of the report evaluates the proposed objectives as to whether they are the most appropriate to achieve the purpose of the Act.

Existing Objective	Appropriateness to achieve the purpose of the Act
5.3(2) - Objective 2 Maintain the sustainability of the land transportation routes and the Gore Aerodrome and the Mandeville Airfield.	This objective provides high level guidance to decision makers around the expectations for the maintenance of the Gore Aerodrome (Airport). It relates only to the ‘sustainability’ of the airport and so does not provide specific direction, or enable any increase in scale. Relevance and Usefulness Due to the broad nature of this objective, it is of limited relevance and provides little guidance and direction. Therefore it is of limited usefulness to decision makers or plan users. This objective further does not flow down to any specific consenting mechanism and therefore the objective is not achieved through the ODP. Reasonableness Provisions in relation to the Gore Airfield will not result in unjustifiably high costs on the community, although the lack of clarity and direction in the Objective and lack of tangible consent pathway for activities may increase costs in a situation where there is dispute over the outcome of a non-compliance. Achievability The objective seeks outcomes within the scope of Council’s responsibilities. However, this objective does not flow down to any consenting mechanism and therefore the objective is not achieved through the ODP.

Proposed Objective	Appropriateness to achieve the purpose of the Act
AIRPZ-O1 Activities within the Airport Zone support the functionality of the airfield and contribute positively to the economic sustainability and resilience of airfield and wider Gore District.	These objectives are considered the most appropriate way to achieve the purpose of the Act because they: • Provide for the operation of the Gore Airport • Support the economic sustainability of the district • Support the resiliency of the Gore Agricultural aviation industry • Manage off site adverse effects from expansion of aviation and associated activities • Ensure activities are cognisant of security, health, and safety. Relevance The objectives are relevant to the issues identified. The objectives seek to recognise the unique nature of the site and provide for the land use activities. They recognise the Gore Airfield as an asset to the district and an important aviation resource, and enable the airfield to expand whilst avoiding offsite adverse effects. They seek to provide for a well-functioning and reliable aviation facility that supports the wider Gore District. Effects from new or expanded activities are managed in order to minimise effects on the amenity of neighbouring land and the cultural relationship Ngāi Tahu hold with the natural environment. The objectives align with the Council’s obligations under s31 of the Act, specifically s31(1)(a) - integrated management of the effects of development on the natural and physical resources of a district, and s21(1)(e). The objectives give effect to higher order documents, specifically the Southland Regional Policy Statement and the National Planning Standards. Usefulness: The objectives provide guidance and direction for decision making and meet best practice by providing clear direction on what the zone is seeking to provide for. Reasonableness: The objectives are unlikely to result in an unjustifiable cost on the community as they provide legitimacy and a policy framework for the existing land use on site. Achievability: The objectives are consistent with identified mana whenua and community outcomes and can realistically be achieved within the Council’s powers, skills and resources. The operation, maintenance and expansion of the Gore Airport is enabled while potential adverse effects are managed.
AIRPZ-O2 The effects arising from new or expanded activities within the Airport Zone are managed to minimise adverse effects on the amenity of adjacent land, and the underlying Ngāi Tahu relationships with the natural environment.	
AIRPZ-O3 Ensure activities are undertaken within the Zone in a manner that provides for the security and safety of the public, occupiers of sites and aircraft operations.	

Summary

The proposed objectives will achieve the purpose of the RMA as they recognise the social and economic contribution that the Gore Airport makes to the district. The objectives clearly support the operation, function, and development of the airfield. The objectives also seek to achieve integrated planning which will provide for a well-functioning airport consistent with the National Planning Standards.

9. Evaluation of Options to Achieve the Objectives

9.1 Evaluation

Section 32(1)(b) requires an evaluation of whether the provisions are the most appropriate way to achieve the objectives by identifying other reasonably practicable options, assessing the efficiency and effectiveness of the provisions in achieving the objectives, and summarising the reasons for deciding on the provisions.

The assessment must identify and assess the benefits and costs of environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including opportunities for economic growth and employment. The assessment must if practicable quantify the benefits and costs and assess the risk of acting or not acting if there is uncertain or insufficient information available about the subject matter.

Section 32(2)(b) requires that if practicable the benefits and costs of a proposal are quantified. Based on the scale and significance of the proposed changes, specifically the degree of change from the ODP, level of policy risk and scale of effects, it is considered that quantifying costs and benefits is unnecessary. Therefore, exact quantification of the benefits and costs identified in this report was not considered necessary, beneficial or practicable. Rather, the table below generally identifies where there may be additional cost(s) and benefit(s).

For each potential approach an evaluation has been undertaken relating to the costs, benefits and the certainty and sufficiency of information (as informed by section 4 of this report) in order to determine the effectiveness and efficiency of the approach, and whether it is the most appropriate way to achieve the relevant objective(s). For the purpose of this evaluation, the Council has considered the following potential options:

- Option A - The proposed provisions
- Option B - The ‘status quo’ provisions.

Option A – Proposed Provisions
Objectives- AIRPZ-O1 - Activities within the Airport Zone support the functionality of the airfield and contribute positively to the economic sustainability and resilience of airfield and wider Gore District. AIRPZ-O2 - The effects arising from new or expanded activities within the Airport Zone are managed to minimise adverse effects on the amenity of adjacent land, and the underlying Ngāi Tahu relationships with the natural environment. AIRPZ-O3 - Ensure activities are undertaken within the Zone in a manner that provides for the security and safety of the public, occupiers of sites and aircraft operations. Policies which give effect to the objectives AIRPZ-P1 Recognition of the Gore Airfield as an Emergency Management asset AIRPZ-P2 Provision of aviation activities AIRPZ-P3 Design of new activities that maintain amenity, avoids reverse sensitivity, manages service demands, recognised Ngāi Tahu values, protects rivers and streams AIRPZ-P4 Ensure activities and designed and operated to avoid adverse safety and functionality effects AIRPZ-P5 Avoid activities that compromise the airport zone or result in reverse sensitivity effects AIRPZ-P6 Close portions of Jubilee Avenue adjacent to areas utilised for airfield purposes AIRPZ-P7 Enable activities that align with the purpose of the zone, support agricultural aviation, contribute to the community, and minimise adverse character and amenity effects Rules, subject to standards, which give effect to the objectives AIRPZ-R1 Aviation Activity AIRPZ-R2 Industrial Activity AIRPZ-R3 Emergency Services Facility AIRPZ-R4 Conference Facility AIRPZ-R5 Office Activity

AIRPZ-R6 Food and Beverage Activity AIRPZ-R7 Retail Activity AIRPZ-R8 Residential Activity AIRPZ-R9 Visitor Accommodation AIRPZ-R10 All other Activities not provided for are non-complying.	
Benefits	Costs
Environmental - To better manage the adverse environmental effects from the Gore Airport including creating a defined area that is known and identifiable. - Clearly defining permitted activities with standards which means anticipated activities are effectively enabled and managed, and inappropriate activities are less likely to locate in the zone.	Environmental There are not considered to be any environmental costs associated with the PDP as the provisions seek to be manage adverse effects to safeguard the environment.
Economic - The increased clarity and direction may reduce costs by giving greater certainty to plan users and increased processing efficiencies. - There may be economic benefits in allowing for further anticipated development within the airport zone.	Economic Increased economic costs are not anticipated.
Social The provisions will clarify the regulation and expected activities in relation to the Gore Airport and be more directive to decision makers and user friendly for plan users. Improved management of the airport and associated activities will have a social benefit by providing this clarity.	Social The provisions may appear more complex to plan users as they are lengthier and more detailed compared to those within the Operative Plan.
Cultural Objective 2 provides for an increase in Ngāi Tahu value awareness for plan users.	Cultural There are not considered to be any cultural costs associated with the PDP as the provisions seek to manage adverse effects and to acknowledge specific cultural values.
Efficiency	
The proposed provisions are considered to be the most efficient means of achieving the objective as together they will: - Provide clear guidance and direction for applicants and decision makers towards the outcomes that are sought to be achieved. The matters for assessment are further defined. - Facilitate a range of aviation activities subject to compliance with effects standards, but require management of activities either not anticipated in the zone or activities that are unable to meet standards. - Be consistent with the National Planning Standards. - Future proof the aviation network.	
Effectiveness	
The provisions are effective at meeting the objective as they directly link to the provision of airport activities and how effects on the environment and people should be managed. The policies recognise the importance of the Gore Airport, both as an Emergency Management asset and for economic support of the community - through agricultural aviation and more general aviation activities. They provide for a diverse range of aviation activities whilst requiring that new activities are designed and operated in a manner that reduces adverse effects. Policies enable a focus on the safety and functionality of the airfield and avoid activities that may result in reverse sensitivity. The provisions enable Council to fulfil its statutory obligations, including duties imposed on the Council under Section 31(b)(iia) of the RMA. The provisions provide a robust framework for making decisions in relation to the airport. Overall, the provisions will enable the Council to effectively administer its District Plan in a clear and consistent manner.	
Risk of acting or not acting	
There is no risk of acting to include the PDP provisions and providing more specific direction in relation to the management of the airport. The risk of not acting is that the status quo is retained which is reliant on broad district wide objectives which are not specific to airport activities. This creates additional uncertainty and cost and will potentially result in worse environmental outcomes.	

Overall Evaluation
Taking into account the above, and the evaluation of Option B below, the preferred option is the Proposed District Plan provisions. The PDP will achieve the purpose of the Act with greater clarity and direction to applicants and decision makers, providing for the effective and efficient management of the airport. The provisions provide clear direction for the management of the airport land, aviation activities, and associated activities as well as the potential effects on people and the environment. The PDP gives effect to higher order documents such the RPS and is in line with the National Planning Standards. Overall, the policies enable activities that are consistent with the intended purpose of the zone, the agricultural aviation needs of the district, and contribute positively to the community.

Option B – Status Quo	
5.3(2) - Objective 2 Maintain the sustainability of the land transportation routes and the Gore Aerodrome and the Mandeville Airfield. This objective provides high level guidance to decision makers around the expectations for the maintenance of the Gore Aerodrome (Airport). It relates only to the ‘sustainability’ of the airport and so does not provide specific direction or enable any increase in scale.	
Benefits	Costs
Environmental There are no known environmental benefits, while aviation activities are not specifically provided for leading to the default requirement of a resource consent, the policy framework does not direct plan users towards environmental protection.	Environmental - There is no specific focus on potential environmental effects specifically associated with the airport or aviation activities. There is a lack of clarity and direction in relation to managing environmental effects. - There are no parameters surrounding what level of environmental effect is acceptable.
Economic There are no specific economic benefits to the status quo.	Economic There are no specific economic costs to the status quo, although the lack of specificity in relation to airport activities may lead to increased uncertainty and processing costs for some consent applications.
Social Provides a recognition of maintaining the airfield and therefore gives the community some expectation of activity occurring.	Social The lack of specific focus on aviation may give rise to inadequate consideration of effects on people which may have social effects.
Cultural There are no specific cultural benefits to the status quo.	Cultural There is no specific recognition of the potential impacts of not adequately managing aviation activities on cultural values.
Efficiency	
The status quo provisions are not efficient in relation to the Gore Airport as there is just one general objective which does not allow for an efficient assessment of effects, related to aviation activities.	
Effectiveness	
The status quo provisions are not particularly effective in relation to the Gore Airport as there is no specific rules that provide for aviation. The status quo does not address the identified resource management issues or support the National Planning Standards which is a higher order document.	
Risk of acting or not acting	
There is no risk of acting to provide more specific focused aviation provisions. The risk of not acting and retaining the status quo is that there will be inadequate assessment and management of aviation and the risk of unmonitored and unconsented activities, which could lead to adverse effects on people and the environment.	
Overall Evaluation	
Overall, the current status quo provisions are not considered appropriate as they do not contain objectives and policies specific to aviation or the Gore Airport. The existing provisions lack clarity and direction and do not provide adequate guidance for applicants and decision makers in relation to the Gore Airport. The policy does not give effect to higher order documents such as the NPS and RPS.	