

25 June 2020

Ministry of Transport
P.O Box 3175
Wellington 6140

Attention: Mr T. Forster

Manager Economic Regulation

t.forster@transport.govt.nz Ph: 04 439 9000

RE: NORTH SHORE AIRPORT

APPLICATION FOR AIRPORT AUTHORITY STATUS

Dear Sir,

This is an application under the provisions of the Airport Authorities Act 1966, requesting North Shore Airport be granted Airport Authority status by the Ministry of Transport.

INTRODUCTION

This application is being lodged with the Ministry of Transport during a most unusual global event, the likes of which we cannot recall having occurred before. The recent widespread upheaval of the aviation sector due to COVID-19 has impacted New Zealand's way of life deeply. There is clear recognition that the commercial landscape within which the aviation industry operates has changed significantly, and it is likely there will be yet further changes. This has accelerated a management review of North Shore Airport operating procedures and systems, in parallel with the continued development and evolution of the North Shore Airport Master Plan.

North Shore Airport management needs to be equipped with the most appropriate and suitable tools with which to nimbly operate under and within the regulatory umbrella moving forward.

Throughout the COVID-19 event North Shore Airport has continued to support Emergency and Medical Service (EMS), and Military and Civil Defence operations, plus others which use the airport regularly.



Although the airport has been closed to all other aviation operational activities in accordance with the Civil Aviation Authority and Ministry of Transport direction, the facility has been maintained and monitored to operational standard to ensure the safety of any essential operations occurring at the airport.

Prior to COVID-19, North Shore Airport management had been well advanced in the process of drafting an application for Airport Authority status for submission to the Ministry of Transport. The rapid unfolding chain of events has reinforced the importance of now lodging this application.

NORTH SHORE AIRPORT

The North Shore Airport Master Plan, which is operative in part as a living document, is attached to this application and offers, among other things, a more detailed account of North Shore Airport's history, surrounding physical environment, socio-economic context, regulatory compliance and ultimately, the aspirations and objectives that North Shore Airport has over the next circa 30 years.

Notwithstanding the Master Plan which was written prior to the current circumstances unfolding, and not wishing to repeat information unnecessarily, there is perceived benefit in revisiting several key components for targeted comment and completeness as follows.

HISTORY

Aviation activities commenced, at what was then known as Dairy Flat Airfield, in the 1950s, with North Shore Aero Club being formed and incorporated in 1963 under the Incorporated Societies Act 1908. Today the site is known as North Shore Airport and has been in existence in one way, shape or form for over 60 years. North Shore Aero Club Incorporated is still the owner of North Shore Airport.

During this time, it has grown into the Airport it is today, well embedded into the community, with around 90 leasehold tenants, bustling flying schools, air transport operators, many businesses and jobs being entirely dependent on the existence of the airport.

The immediately surrounding environment comprises a large lot residential aero park on one boundary and, as a result of the Auckland Unitary Plan Operative in Part (AUP-OP) and the associated Dairy Flat Structure Plan, future business and light industrial zoned land on the balance of the surrounds.

Traditionally North Shore Airport has been an integral part of the local community, with an excellent standing and rapport amongst the neighbours, many of whom were interested in aviation and often members of North Shore Aero Club. The current developments under the AUP-OP have tended to weaken those long standing bonds as the status of the land changes and properties are sold to investors for future development.

OVERVIEW OF AUCKLAND'S AIRPORTS

The immediate Auckland environment has five Airports that have been recognised and assessed as critical infrastructure within the AUP-OP. Each has a unique role and place within the aviation sector and transport network in particular. Despite this, there is of course some capability overlap and cross pollination of services to the aviation industry and the largely silo community areas they serve.



Auckland International Airport (AIA) is New Zealand's leading gateway to the world, facilitating international traveller entry and exit and corresponding distribution of passengers to domestic destinations through the various airlines serving AIA.

Predominantly a heavy and medium jet facility it also caters for turboprop aircraft servicing smaller domestic destinations. The second runway at AIA has Resource Consent approval and commencement of pre-construction engineering work has started, but the impact of the current events will have a financial consequence upon AIA, and we expect the execution of that programme may be delayed somewhat.

Whenuapai, a NZ Defence Force base located within close proximity to Auckland is a strategic military asset. We do not see that changing, neither does there appear to be any current political appetite to co-share military and domestic facilities at Whenuapai.

Ardmore Airport, West Auckland Airport and North Shore Airport are the satellite airports servicing Auckland to the south, west and north respectively. These airports are predominantly light commercial, general aviation and flight training facilities and are recognised under the AUP-OP as strategic assets.

North Shore Airport is appropriately established, fulfilling its role in Auckland's strategic hierarchy of aviation services to both the immediate North Shore communities and the wider northern regions of Auckland City, with the full support of Auckland Council embedded within the Auckland Unitary Plan.

CURRENT STATUS OF NORTH SHORE AIRPORT UNDER THE AUP-OP

North Shore Airport was formerly zoned Special Zone 4 under the Rodney District Plan, which was entitled 'Special Purpose - Airports and Airfields Zone'. This has now been superseded under the AUP-OP with the North Shore Airport Precinct.

North Shore Airport was cemented into the AUP-OP through what was an open, transparent and time consuming public consultation, submission and hearing process. Detailed submissions were tabled by North Shore Airport, supported by professional evidence which was tested during the formal hearing process, and where the legal framework, public interest and necessary practical requirements were balanced to form the current zoning.

The resulting North Shore Airport Precinct offers certainty, ensuring the airport, referenced and recognised in the AUP-OP as a strategic asset, has the necessary town planning regulatory support to protect and facilitate forward operation.

The North Shore Airport Precinct clearly identifies its objectives which are:

- 1. "The efficient operation of the airport, while recognising existing amenity values in the surrounding area."
- 2. "Aircraft operations and appropriate commercial and industrial activities associated with aviation are enabled."

The North Shore Airport Topic Report published by Auckland Council in December 2017 is a document solely dedicated to the regional significance of North Shore Airport and states, amongst other things in reference to North Shore Airport:



- 1. "The Auckland Unitary Plan Operative in Part (AUP-OP) Regional Policy statement recognises the need to protect significant regional infrastructure which includes airports."
- 2. "The Auckland Plan therefore recognises the role of the North Shore Airport and even at this high level provides direction to protect such transport infrastructure."

The AUP-OP makes many references to the valuable and critical nature of North Shore Airport such as:

- 1. "The airport is also identified in Map 6.1 Auckland's Economy which shows, among other things, key economic infrastructure."
- 2. "Chapter 10 refers Urban Auckland, the discussion of business areas recognises airports as business and employment areas."
- 3. "In relation to the airport, Principles 5 and 10 are relevant and are to;
 - I. (5) Optimise existing and proposed transport investment
 - II. (10) Ensure that transport is sustainable in the long term, minimises negative impacts on people's health and the built and natural environment"

Suffice to say the creation of the AUP-OP produced a robust strategic and legal framework that clearly underpins the importance of North Shore Airport within the future of the Auckland region.

CONSULTATION

North Shore Airport has been subject to significant public scrutiny over the last seven years or so during the progression of the AUP-OP and its various associated supporting processes, such as the Future Urban Land Supply Strategy, Silverdale West Dairy Flat Structure Plan and North Shore Airport Topic Report published by Auckland Council in 2017.

Consultation during these processes has included and encompassed the general public of Auckland, local landowners, residents (recognising that not all residents are landowners), key infrastructure providers (New Zealand Transport Agency, Auckland Transport, Watercare, etc), the Supporting Growth Alliance and North Shore Airport stakeholders (businesses, lease holders, employees, pilots, learners, etc).

The AUP-OP process has been and continues to be very heavily consultative at its core. Furthermore, throughout this process, the AUP-OP and its associated processes have solidly underpinned the presence of the North Shore Airport with the utmost clarity.

North Shore Airport management are of a view further consultation on Airport Authority status is unwarranted and without clear merit as the future of North Shore Airport has already been extensively addressed and settled by the AUP-OP process.

NORTH SHORE AIRPORT EXPECTATIONS

North Shore Airport management is planning for long term maturing growth at the Airport, for technological changes within the aviation industry that impact the way aviation services are offered and the way aviation operations are conducted, and for the changing aviation environment that continuously evolves under the various national and international regulatory umbrellas.



Airport Authority status to us, is an overlay mechanism that will allow a nimbler level of adaption to the regulatory and bureaucratic matters pertinent to airport operations. The resultant improvement in our ability to adapt will be seen in a wide array of areas including airport safety, security, obligations under the Ministry of Transport, Safety Management Systems (SMS) regulations under the Civil Aviation Act 1990 and the Health and Safety at Work Act 2015.

In short, the conferment of Airport Authority status is another helpful tool in the management toolbox, and like all tools it needs to be used for the right tasks and exercised sensibly with wisdom and due consideration.

The request for, and the granting of Airport Authority status by the Ministry of Transport, is clearly appropriate given that Airport Authority status is a focused facilitation tool fit for purpose and intended to be applied to airports. It will undoubtedly assist North Shore Airport management in remaining focused and disciplined, and able to make sound, robust and credible decisions.

North Shore Airport, in collaboration with its aviation partners and stakeholders is, and continues to be, committed to the timely provision of sufficient aerodrome capacity to meet the demands of the New Zealand community. This must be sustainable in a range of weather conditions, with respect to compatible surrounding land-use, for resilience in the provision of aerodrome services and for the greater good of the nation. North Shore Airport has done this traditionally through a conservative organic growth based model that keeps pace with the changing operational environment. This historical operational platform has served North Shore Airport well, but to forward plan effectively in the increasingly fast paced communication environment the world has become, requires a more focused and timely information stream and implementation certainty once decisions have been made.

The more immediate short term recent events surrounding COVID-19, have refocused attention to operational issues such as security of the aerodrome at large, buildings, aircraft, fuel supplies and runways within the confines of the aerodrome. Recent civil defence emergencies such as the eruption of Whakaari White Island and the very next day, the Rangitata River breaching its banks, have also highlighted the importance of comparable airports like Whakatane and Timaru respectively in civil defence situations. COVID-19 is no different and if nothing else, airports like North Shore Airport are invaluable civil defence infrastructure which must be diligently managed unconditionally.

TESTIMONIALS AND SUPPORTING DOCUMENTATION

The management team at North Shore Airport have chosen not to supply any testimonials or letters from supporting stakeholders at this time as it is felt that they would add little weight and value to the application in reality. It is clear from the patronage of North Shore Airport that the stakeholders are heavily invested in, and supportive of the facility and in conjunction with the AUP-OP, the approval and support of North Shore Airport within the community is clear.

The North Shore Airport Master Plan is being supplied as supporting documentation with this application and included at the end of this document are links to relevant components and sections of the AUP-OP and associated documents that are relevant.



CONCLUSION

North Shore Airport has a role to play within the local community, the wider New Zealand economic context and the aviation industry, promoting safe and efficient operations within an environmentally responsible and accessible framework. Granting Airport Authority status to North Shore Airport will assist to underpin those imperatives. The legislation is fit for purpose and entirely suitable for its intended use in this respect.

Please do not hesitate to contact the authors should you have any queries.

Yours sincerely,

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General Manager 021 95 94 97 **President** 021 115 4696

ATTACHMENTS

Document Name	Source Location
North Shore Airport Master Plan	Attached
Auckland Unitary Plan	http://unitaryplan.aucklandcouncil.govt.nz
North Shore Airport Topic Report	https://www.aucklandcouncil.govt.nz/have-your-say/topics-you-can-have-your-say-on/silverdale-west-dairy-flat-industrial-area-structure-plan/docsconsultation/north-shore-airport-topic-report.pdf
Silverdale West Dairy Flat Industrial Area Structure Plan	https://www.aucklandcouncil.govt.nz/plans- projects-policies-reports-bylaws/our-plans- strategies/place-based-plans/Pages/silverdale- west-dairy-flat-industrial-area-structure-plan.aspx