



Submission by Papa Rererangi i Puketapu Ltd (PRIP)

Proposed Plan Change 2 (Puketapu Structure Plan Development Area) to the
New Plymouth Part Operative District Plan

19 May 2026

Submitter Details

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Signature of person authorised to sign
on behalf of Papa Rererangi i Puketapu
Ltd (PRIP)

19 May 2026

Date



**SUBMISSION ON NEW PLYMOUTH PART OPERATIVE DISTRICT PLAN
PLAN CHANGE 2: PUKETAPU STRUCTURE PLAN DEVELOPMENT AREA**

To: New Plymouth District Council
Address: Private Bag 2025, New Plymouth 4342
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Submitter Details

Please note that all information provided in your submission, including your personal information, will be made publicly available.

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Trade Competition

Can you gain an advantage in trade competition in making this submission? Yes ☐ No ☒

Are you directly affected by an effect of the subject matter of the submission that:

- (1) Adversely affects the environment; and
(2) Does not relate to trade competition or the effects of trade competition. Yes ☒ No ☐

Council Hearing

Do you wish to be heard in support of your submission? Yes ☒ No ☐

If others make a similar submission would you consider presenting a joint case with them at a hearing?
Yes ☐ No ☒

Submission

Any attachments to your submission should only be supporting information, not the submission.

PRIVACY ACT NOTE: Please note that all information provided in your submission, including your personal information, will be made publicly available.

Signature of the person making submission
or the person authorised to sign on behalf of the
person making submission
(Note: A signature is not required if you are making
your submission by electronic means.)

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1 Introduction to Papa Rererangi i Puketapu Ltd (PRIP)

New Plymouth Airport (the Airport) is owned by a standalone company Papa Rererangi i Puketapu Ltd (PRIP) which is a Council Controlled Trading Organisation. PRIP is 100% owned by New Plymouth District Council (NPDC) and operates as a standalone Company governed by an independent skills-based Board of Directors.

PRIP's prime objectives are to:

- Operate the Airport in full compliance with the regulations set down by the New Zealand Civil Aviation Authority
- Ensure that the business is run on a sustainable commercial basis
- Optimise the use of its assets
- Generate a reasonable rate of return on investment.

The Airport is the aviation hub for the Taranaki region. The Airport plays a significant role in facilitating access, trade, tourism and economic activity locally, regionally and nationally.

The Airport contains critical infrastructure assets including sealed and unsealed runways, taxiways, aprons, passenger terminals, aircraft hangars, carparking areas, roading and underground utilities. The site also contains critical aviation related operations including Air Ambulance services, heliports, air traffic control and navigational aids, refuelling services and significant areas of land and buildings to serve commercial tenants.

2 Airport Activities, Operations and Future Planning

Listed below is a range of PRIP workstreams, reports, future focused initiatives and events in recent years that provide context to the matter at hand – namely the land use tension between Airport activities and operations and the proximity / encroachment of noise sensitive development:

- a) **New Plymouth Airport Master Plan (2014):** this document considered a 10-year planning horizon to 2023. The 2014 Master Plan considered future passenger numbers with a predicted growth in passenger numbers to over 550,000 by 2023.
- b) **Plan Change 20 (2014-2015):** PRIP actively engaged through proposed Plan Change 20 to the operative New Plymouth District Plan which sought to rezone Bell Block 'Area Q' Rural Environment Area to Residential A Environment Area and Application of Future Urban Development Overlay to 'Area R'.
- c) **Updated Noise Contours (2013-2015):** Marshall Day Acoustics was commissioned to prepare updated noise contours for the Airport which were also used through the hearings process for Plan Change 20 to the Operative New Plymouth District Plan.
- d) **New Airport Terminal (2014 – 2020):** PRIP committed to a new terminal at New Plymouth Airport and co-designed the terminal building in partnership with Puketapu Hapu. Construction of the new terminal (Te Hono) was completed in March 2020.
- e) **PRIP established (2017):** A new Airport company, Papa Rererangi i Puketapu Ltd (PRIP) was formed.
- f) **Runway Extension / Realignment Options Assessment (2019):** a number of high-level options were considered to provide additional length to the runway. Noting there are significant constraints to physically extending the runway at either end, an option to realign

the runway was indicatively identified as the preferred future option. As part of the MCA process to assess options, Marshall Day Acoustics prepared an indicative noise contour plan to assess the range of options considered. This contour map is attached as **Attachment 2**, noting this contour plan is indicative and 'crude' to the extent it was not the subject of modelling but rather crudely rotated the 2015 contour to inform the MCA process at a high level.

- g) **COVID (2020):** COVID had a dramatic effect (reduction) on passenger numbers through Te Hono.
- h) **Updated Master Plan (2025):** this document considered a 20-year planning horizon to 2035 including: air and landside maintenance, upgrade and improvement projects, forecasting of passenger numbers (growth of around 2.5% over 20 years) and the need to extend the existing runway length / realign the runway to mitigate major long term viability risk and a capital works programme.
- i) **New Plymouth District Plan Review (2019-2025):** PRIP pro-actively engaged in the District Plan Review (lodged submissions and presented evidence at numerous district plan hearings) which was a wholesale review of the district plan framework. A key focus of the district plan review was to recognise the strategic importance of the Airport to the district and wider region, and protect the ability of the Airport to operation, be maintained and be upgraded into the future. Key focus areas for PRIP were:
 - the interface between residential land (Area Q and adjacent land primarily) and the operational airport, and in particular the potential for land use development to adversely impact the ability to effectively and efficiently operate and upgrade, and
 - the potential for a realignment of the airport runway, and the need to protect that option to the extent possible (noting there were some scope limitations in effect).
 - the provision of a developable area(s) within the Airport Zone to enable an element of complementary retail, commercial and entertainment type activities.

3 Planning Policy Context

The New Plymouth District Plan, including Proposed Plan Change 2 - Puketapu Structure Plan Development Area (the 'Puketapu Plan Change'), must 'give effect' to higher order planning documents. Key documents and provisions in this context include:

- National Policy Statement for Infrastructure 2025,
- National Policy Statement for Natural Hazards 2025,
- National Policy Statement for Highly Productive Land 2022,
- New Zealand Coastal Policy Statement 2010,
- National Policy Statement on Urban Development 2020, and
- Taranaki Regional Policy Statement 2010.

The above national planning framework provides the framework to both enable and protect the Airport as regionally significant infrastructure. The above national / regional direction is filtered into the New Plymouth District Plan which manages land use activities in the district and provides the blueprint for future land use activities.

Balancing the land use tension between an operational airport (including potential upgrades) and identifying and releasing new land for urban growth is a recognised land use tension.

The most recent of these - the National Policy Statement for Infrastructure - which came into force on 15 January 2025 and applies to the airport as meeting the definition of infrastructure - seeks that *'infrastructure is well-functioning, resilient and compatible, as far as practicable, with other activities'* as part of this objective. Of particular note, under the relevant policies decision-makers must:

- Consider relevant master plans prepared by the infrastructure provider and provided to the decision maker (Policy 3(b)) and
- Manage the interface between existing and planned infrastructure and other activities to ensure these are as compatible as practicable and operations and upgrades of infrastructure are not compromised by the effects of other activities (Policy 10(1)(a) and (b)).

4 New Plymouth District Plan (Part Operative)

PRIP engaged in the District Plan Review process, lodging submissions and presenting evidence through the District Plan hearings. Key outcomes secured through the process include:

- **Strategic Directions:** acknowledgement of the strategic importance of the Airport to the district in UFD Objective 21,
- **Noise:** inclusion of noise contours (Air Noise Boundary and Outer Control Boundary), and the insertion of a non-complying rule for any noise sensitive activities within the Air Noise Boundary,
- **Subdivision:** in context of land surrounding the Airport, requiring any rural subdivision near the Airport to obtain a non-complying resource consent (i.e., the highest threshold test),
- **Residential development:** specific control in place to manage any residential type development (i.e. residential dwellings able to be constructed without subdividing the land) near the Airport. All 'living activities' require a resource consent,
- **Area Q:** retention of Area Q reverse sensitivity provisions - there remains a need to register no complaints covenants on any new lots created in the 50dB contours as shown on the Area Q Development Area Figure,
- **Designation:** rolling over of the Aerodrome designation,
- **Airport Zone:** provision of an enabling Airport Zone for airport related activities and operations, including a Future Development Area, Landside Facilities and Operations Area and General Aviation Area enabling a range of retail, commercial, entertainment and other activities.

With the above framework in place, PRIP was satisfied that the land use tension between the Airport and encroaching urban land use was manageable from an operational perspective and that a suite of complementary activities could be enabled within the Airport Zone. On that basis, PRIP did not lodge an appeal on the District Plan decisions.

4.1 Airport Zone – Retail, Commercial, Entertainment and Other Activities

The Airport Zone (AIRPZ) provides an enabling framework for activities that are compatible with the role, function and predominant character of the New Plymouth Airport in the sub-precinct areas: Future Development Area, Airside Facilities and Operations Area, General Aviation Area and Landside Facilities and Operations Area.

PRIP engaged through the District Plan Review process to establish a policy framework and direction with respect to what activities would potentially be compatible and what would not.

A list of these activities are:

AIRPZ-P4 (Potentially Compatible Activities)	AIRPZ-P5 (Incompatible Activities)
1. development area; retail activities (excluding supermarkets, large format retail activities and integrated retail activities) in the landside facilities and operations areas and airport future 2. visitor accommodation in the landside facilities and operations areas and airport future development area; 3. entertainment and hospitality activities in the landside facilities and operations areas and airport future development area; 4. aviation centre and museum in the airside facilities and operations areas and general aviation area; 5. airport retail and commercial activities in the airside facilities and operations areas and general aviation area; and 6. integrated retail activities landside facilities and operations areas and airport future development area.	1. supermarkets; 2. large format retail activities; 3. Māori purpose activities; 4. business service activities; 5. commercial service activities (excluding service stations); 6. living activities; 7. community facilities; and 8. community corrections activities.

The District Plan decisions effectively provide a policy framework for a planned centre in the Airport Zone that would complement the Airport’s role and function, provided the centre is at a scale and offering that would not undermine the viability of the city centre, or town or local centre. Within this context, and noting the strategic importance of the Airport as recognised by Strategic Direction Urban Form and Development Policy 26:

- it is critical that any retail / commercial offering within the proposed Local Centre Zone plan change area is appropriately scaled and targeted (specific activities) to not compromise the integrity and viability of the established Airport Zone, which has been determined to be an efficient land use through the District Plan Review process; and
- the establishment of the proposed Local Centre Zone has the potential to unreasonably create future restrictions and limitations on the scale and type of activities able to be established within the Airport Zone (i.e. be at odds with the strategic policy direction to protect existing ‘centres’).

As such, clear direction is required through the plan change process to determine an appropriate scale and type of offering at the specific location which does not compromise the land use development potential of the established Airport Zone.

PRIP would support in principle an appropriately scaled and targeted retail offering to the extent it would not create inefficiencies of land use zoning with the Airport Zone’s land use framework.

4.2 Noise contours

New Zealand Standard 6805:1992 recommends approaches for territorial authorities with airports and land affected by airport noise. The two-fold purpose of the Standard is to:

- Prevent where possible, or limit, noise sensitive activities from establishing near an airport that could give rise to reverse sensitivity effects; and

- Provide certainty for residents by providing noise control boundaries which airport noise emissions must not exceed.

To achieve these aims, the Standard recommends two noise control boundaries.

- An Outer Control Boundary (OCB), typically defined by the 55dB L_{dn} contour; and,
- An Air Noise Boundary (ANB), typically defined by the 65dB L_{dn} contour.

The New Plymouth Part Operative District Plan contains the above referenced noise control boundaries which are illustrated on the Planning Maps. The OCB and ANB contours set in the District Plan were generated circa 1998; notwithstanding contours were also generated in 2015 as part of a plan change process to the then operative District Plan (Plan Change 20). Plan Change 20 to the then operative District Plan rezoned Future Urban Zone land to Residential Land - known as Area Q. Plan Change 20 / Area Q cautiously included additional airport noise related reverse sensitivity provisions (including a 50dB L_{dn} noise contour) as a result of the potential realignment of the existing airport runway and the potential for reverse sensitivity effects.

The proposed Puketapu Plan Change seeks to effectively extend the residential areas known as Area Q closer to the Airport. As such, the Plan Change 20 / Area Q airport related reverse sensitivity provisions are rolled-over into the Puketapu Plan Change. PRIP supports this conservative approach.

4.3 Realigned runway considerations

PRIP has explored the options for runway extension and realignment in their master planning workstreams, based on the high-level optioneering back in 2019. A runway re-alignment (as opposed to extension) continues to be the preferred option. This is due to site constraints along the current alignment (notably cultural-related constraints) as well as coastal erosion, noting also regulations continue to evolve in terms of runway length and safety requirements.

The potential for the runway to be realigned is a consideration for future proofing of airport operations.

5 PRIP's Interests on the Puketapu Plan Change

The Puketapu Plan Change seeks to provide residential and commercially zoned land to facilitate urban growth in the area between Wills Road and Airport Drive in Bell Block. Critically, this involves expanding the existing residential zoned area in the plan, closer to the Airport's boundary and operations, including aircraft noise.

PRIP acknowledges the early consultation efforts from NPDC officers prior to the Puketapu Plan Change being publicly notified. This acknowledges the strategic importance of the Airport to the district and wider region, as well as the potential for reverse sensitivity effects to be generated at the urban land use / airport interface.

Consistent with involvement in previous planning related processes, PRIP's primary interests in the Puketapu Plan Change are to:

- recognise the strategic importance of the Airport to the district and wider region,
- protect Airport's ability to effectively and efficiently operate, be maintained and be upgraded, particularly in the context of reverse sensitivity effects and land use development, and
- take into account the potential for a realignment of the airport runway, and the need to protect that option to the extent possible.

5.1 Principal Issues

- Extent of new residential development in proximity to the Airport – PRIP is comfortable with the extent of development identified in the plan change but would oppose any further urban land use expansion towards the Airport.
- Management of reverse sensitivity – primarily through the mechanism of requiring ‘no-complaints’ consent notices on new titles when located within the New Plymouth Airport Control Boundary 50dBA contour (triggered by the activity of subdivision) and policy direction to provide activities within the New Plymouth Airport 50dBLdn noise contour to provide noise mitigation.
- Scale and type of activities potentially enabled through the proposed Local Centre Zone, and the potential inefficiency of this zoning with respect to the Airport Zone’s ability to provide retail, commercial, entertainment, visitor accommodation and other activities which are complementary to the Airport Zone.

Attachment 1: Detailed Submission by PRIP

The following table sets out the decisions sought by Papa Rererangi i Puketapu Ltd (PRIP), including specific amendments to provisions of the Proposed Puketapu Plan Change to District Plan (the Plan). These amendments are shown as red underline (for new text sought) and ~~red strikethrough~~ (for deletion).

Proposed Plan Provision	Support/Oppose/ Amend/Add	Reasons	Relief Sought
DEV1-P6	Support	No changes are proposed to provision DEV1-P6, which requires activities within the New Plymouth Airport 50dBLdn noise contour to provide noise mitigation. PRIP support the retention of this provision. Provisions in the NOISE chapter of the New Plymouth Part Operative District Plan (which are not subject to this plan change), require that noise sensitive activities within Airport noise control boundaries provide noise mitigation to achieve the specified noise level.	Retain with no amendment as notified.
DEV1-R2 - Subdivision of an allotment within the Puketapu Structure Plan Development Area. (Stage 1)	Support	Provision DEV1-R2, requires (for subdivision in the Puketapu Structure Plan Development Area to be a Restricted Discretionary Activity) that a no complaints agreement is registered on the title, if within the New Plymouth Airport Control Boundary 50dBA contour. The matters of discretion listed in (2) include DEV1-P6, which reference noise mitigation.	Retain as notified.
DEV-R4 - Subdivision of an allotment within the Puketapu Structure Plan Development Area (Stage 2)	Support	Clause 6 is proposed as an addition to this Stage 2 rule, which would required a no complaints agreement is registered on the title, if within the New Plymouth Airport Control Boundary 50dBA contour to be a Restricted Discretionary Activity. The matters of discretion listed in (2) include DEV1-P6, which reference noise mitigation.	Retain as notified.
Structure Plan Guidance: New Plymouth Airport	Support with amendment	The Guidance only currently refers to Stage 1, whereas the extended areas now also include areas of Stage 2 within the 50dB noise contour.	Amend: Structure Plan Guidance: New Plymouth Airport Stages <u>1 and 2</u> of the Puketapu Structure Plan Development Area is situated near the New Plymouth Airport. . . .
Figure 105 – Structure Plan (Appendix 2)	Support	PRIP is comfortable with the proposed structure plan development area notified (with the reverse sensitivity controls in place) and the mapping of the New Plymouth Airport Control Boundary 50dBA contour; however would not be supportive of any further extension of the structure plan area in the direction of the Airport, as this may start to compromise the options for future upgrade or runway realignment in future.	Retain as notified.
Structure Plan Guidance Local Centre Zones	Neutral	PRIP does not oppose the provision of a Local Centre Zone to service the proposed urban development within the Puketapu Plan Change Area.	The potential impact of a new 7,000m2 Local Centre on the Airport Zone's retail, commercial, entertainment enabled activities (in the sub

Proposed Plan Provision	Support/Oppose/ Amend/Add	Reasons	Relief Sought
		However, the offering needs to be of a scale and activity type that does not compromise the role/function of the Airport Zone, inclusive of the sub-precinct areas and the retail, commercial, entertainment activities and operations enabled through the existing District Plan framework. The Section 32 Report (para 135 onwards) addresses the location of the Local Centre, and states '<i>Economic evidence considers that the most appropriate location for any new commercial centre is along Airport Drive. This is because it has high visibility and profile, and can attract airport traffic, making it more economically appealing (and therefore more sustainable) to retailers.</i>' The s32 Report and supporting content fails to consider the impact of the proposed Local Centre on the Airport Zone, thereby compromising the ability to achieve objectives AIRPZ-O1, O2 and O3. The establishment of a proposed 7,000m2 Local Centre Zone will unreasonably place restrictions on the ability for PRIP to fulfil the development potential of its land use zoning established through the recent District Plan Review. Of note, once established, the Local Centre Zone would benefit from policy protection under UFD-23.	precinct areas) is not sufficiently assessed or understood with respect to potential inefficiencies of land use zoning in the District Plan, and more broadly in the context of the impending spatial planning workstreams and framework. Relief sought: - Undertake specific analysis on the impact of the proposed Local Centre Zone on the Airport Zone's enabled land use activities; and thereafter, - Refine the specific activities enabled in the proposed Local Centre Zone along Airport Drive and - Potentially reduce the size of the proposed Local Centre Zone along Airport Drive if deemed appropriate. - PRIP seeks adequate protection of the established Airport Zone, and the ability to fulfil the development potential in the sub-precinct areas secured through the District Plan Review process.

Attachment 2: 2015 Noise Contours for Realigned Runway/ Masterplan Option 1 (dotted contours lines)

