

In the matter of: The Resource Management Act

And

In the matter of: of the hearing of submissions and further  
submissions on the Proposed  
Waimakariri District Plan – Stream 12:  
Rezoning of land

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**STATEMENT OF EVIDENCE OF MICHAEL EDWARD GROOME  
ON BEHALF OF DANIEL SMITH**

**DATED: 11 MARCH 2024**

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## **Introduction**

1. My full name is Michael Edward Groome. I am a Director of Avsafe Consultants Ltd – Aviation Consultants. I am a qualified Aviation Auditor and Incident Investigator. I have been studying for a Bachelor of Aviation Management at Massey University, yet to be completed.
2. I have worked in the area of aviation for 40 years. My experience includes.
  - 2.1. Being an active aeroplane and helicopter pilot.
  - 2.2. I have spent much of my life in senior management positions for commercial general aviation businesses.
  - 2.3. I spent 12 years as the Chief Executive Officer and General Manager of the Taupo Airport Authority.
  - 2.4. Eight years as the Chair of the New Zealand Aviation Community Advisory Group
3. I have previously prepared reports regarding Aeronautical and Safety Studies, Masterplans and Civil Aviation Certification requirements for,
  - 3.1. The Masterton District Council, Ministry of Transport,
  - 3.2. Waimakariri District Council,
  - 3.3. Matamata Piako District Council,
  - 3.4. Opotiki District Council
4. I am authorised to provide expert evidence on the proposed Waimakariri District Plan (pWDP) in relation to the submission lodged by Daniel Smith to rezone land in and around the Rangiora Airfield.
5. In my evidence I will provide details on what the proposed rezoning will provide for and the benefits it will bring.
6. I previously completed on behalf of the Waimakariri District Council (WDC) an Aeronautical Study of the Rangiora Airfield in February 2023 to determine the safety risks at, and in the vicinity of the airfield and to identify acceptable means of mitigating those risks. This followed a letter from the Civil Aviation Authority of New Zealand in April 2022 requiring WDC to conduct such a study and provide sufficient information to enable the Director Civil Aviation to identify and assess the risk to aviation safety of the operation of the aerodrome as per requirements of Civil Aviation Rules

139.21(d)(1) & (2), so as to determine whether Rangiora Airfield should become a qualifying aerodrome. The study was to assess the current infrastructure of the airfield, the airspace round it, operations on the airfield and the effects of a proposed private Airpark adjacent to the airfield.

7. I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2022. I agree to comply with this Code of Conduct. This evidence is within my expertise, except where I state I am relying on what I have been told by another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

8. In preparing my evidence I have reviewed:

- The Civil Aviation Rules
- The Plan by DM and AD Smith Investments Ltd
- WDC District Plan Rangiora Airfield Decision 2020
- Aeronautical Intelligent Movement Management data
- International Aviation Academy of New Zealand information
- Rangiora Airport Strategic Planning 2007 – Airbiz
- Waimakariri Economic Development Strategy 2024-34

### **Scope of Evidence**

9. My evidence addresses:

- The Rangiora Airfield
- The Airfields Physical Characteristics
- Airfield Use and Activities
- DM and AD Smith Investments Ltd Proposal
- Potential Benefits of the Proposal

### **Purpose of Evidence**

10. The purpose of my evidence is to address the benefits that the Rangiora Airfield along with the proposed Airpark development by DM & AD Smith Investments Ltd (DASI) adjacent to the airfield will bring to Rangiora and the wider Waimakariri District.

11. Although the airfield and Airpark, are separate entities, due to regulatory requirements, when completed the two will become essentially one site with common use of the airfield runways.

12. My evidence includes background information about the Rangiora Airfield and its importance to the region, including current activities and its position within the Civil Aviation regulatory system, and will cover the level of activity at the Rangiora Airfield and the increase in activity with the inclusion of the DASI Airpark.
13. I also cover the proposed Airpark and the effect this will have on the Rangiora airfield as well as the economic benefits it may bring to the region.

### **Rangiora Airfield**

14. In 2020 the Rangiora Airfield was designated for Airfield Purposes within the Operative District Plan. The designation and associated provisions signify the protection of the Rangiora Airfield as a significant asset to the region. Details of the designation and associated plan change and provisions are provided in the evidence of Mr Chrystal.
15. Airfields large and small operate in a challenging environment, with Rangiora being no different. The priorities of the airfield user and that of the airfield operator can sometimes conflict. The wider objectives of the Waimakariri District Council (WDC) is for their airfield to play a role in the economic and social wellbeing of their district.
16. New Zealand's airfields vary greatly in size and utilisation, but all have costly and sometimes unavoidable infrastructure requirements. Some of these requirements are not dictated by airport capacity, but by the regulatory system of which they are a part. The smaller airfields such as Rangiora generally struggle to meet these infrastructure needs due to limited revenue streams, requiring financial assistance, as in this case from WDC.
17. With the increase in popularity of recreational light aircraft, and the reluctance of owners to operate from major airfields due to costs and operating limitations, the Rangiora Airfield is becoming a more attractive base for the recreational pilot and general aviation. With this increase in activity, the demand for aircraft hangars and support services increases, as does the requirement for land to build these hangars on. This has been addressed by Mr McLeod.
18. The Rangiora Airfield is a vibrant aviation hub and one of several small airfields on the Canterbury Plains and is by a large margin the busiest of all these airfields. The predominant use of the airfield is Recreational and General aviation. The airfield is home to many different types of aviation activity including possibly the largest microlight<sup>1</sup> aircraft base in New Zealand.

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<sup>1</sup> An aircraft with a maximum all up weight not exceeding 600kg. CAA Advisory Circular AC103-1

19. The Rangiora Airfield is currently an Unattended and Non-Certificated airfield owned and operated by the WDC. These terms are defined as follows:
- **Unattended<sup>2</sup>** This is an aerodrome in Class G airspace which does not have air traffic control services to separate aircraft from one and other, and where pilots must use the “see and be seen” practice of self-separation.
  - **Non-Certificated<sup>3</sup>** Is an aerodrome which is not operated under the authority of an aerodrome operator certificate issued by the Civil Aviation Authority of New Zealand. (CAANZ).
20. As the owners of the Rangiora Airfield, the WDC is responsible for ensuring the airfield is operated and maintained in accordance with the applicable CAANZ Rule Part 139<sup>4</sup>. Nearly all the Civil Aviation of New Zealand Rules are based on international standards and practices as set by the International Civil Aviation Organisation (ICAO).
21. Following the Aeronautical Study requested by the Civil Aviation Authority of New Zealand which I undertook, WDC at a meeting in May 2023, agreed to start the process of becoming a Qualifying Certificated Aerodrome as per the Civil Aviation Rules. This would allow the WDC support from the CAANZ who then has greater oversight of the airfield. This also means that the Rangiora Airfield must meet certain operating, design, and management requirements of the CAANZ.

### **Airfields Physical Characteristics**

22. Rangiora Airfield covers approximately 50.7 hectares of land situated some 5 km to the west of the Rangiora township. It is bounded by reserve land adjoining the Ashley (Rakahuri River) to the North, Merton Road to the east and rural farmland to the south and west. The area covered by the airfield itself and within the ownership of WDC is relatively limited in terms of being able to provide for future opportunities for expansion and not conflict with the runway design parameters of obstacle limitation surfaces and side clearances as set by the CAANZ Rules. Mr McLeod has provided some context on this and the levels of interest which are not being met.
23. The airfield has three runways, all of which have a grass surface. One main runway (07/25) and two cross runways.

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<sup>2</sup> CAA Rules Part 139.19

<sup>3</sup> CAA Rule Part 71.113

<sup>4</sup> <https://www.aviation.govt.nz/rules/rule-part/show/139>

24. The main runway is 1180m long by 60m wide and is more than adequate for the type of aircraft which currently use the airfield. The runways can accommodate larger light twin engine aircraft used for charter operations. Its main use is currently for recreational and private aircraft, which do not need a long runway from which to operate.
25. The main runway cannot currently be extended due to the current airfield boundaries at each end. There have been discussions around extending it to 1300 metres which would require the acquisition of approximately 4 hectares of land from the neighbour at the western end of the runway. This extension would be necessary if the runway was to be sealed at some point.
26. The cross runways are 10/28 and 22/04 and are identified on Appendix 1 to Mr Noad's evidence. Both these runways are impacted by trees and stop banks at the northern ends associated with the Ashley River environs.

### **Airfield Use and Activities**

27. There are no regular passenger transport operations to or from the Rangiora Airfield.
28. Resident users along with itinerant aircraft users generated more than 42,000 aircraft movements in the 2023 calendar year<sup>5</sup>. Aircraft movements have been increasing since 2018.
29. There are 161 aircraft based on the Rangiora Airfield. 57% of these are microlights, 33% are general aviation aircraft, 2% are agricultural aircraft and 8% are helicopters.
30. There are 23 businesses based on the airfield.
31. The Rangiora Airfield has 134 hangar sites, all of which are leased out to private tenants. Of those sites there are only 5 which do not have a building on them.<sup>6</sup>
32. It is understood that there is at least one enquiry every month for hangar space at Rangiora, and due to lack of space those enquiries are being transferred to other airfields outside the district.

### **Recreational Aviation**

33. Recreational aviation makes up the greatest number of aircraft movements on the Rangiora Airfield.

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<sup>5</sup> AIMM (Aeronautical Intelligent Movement Management)

<sup>6</sup> WDC Data

34. These come from the resident Microlight and General Aviation fraternity and from itinerant aircraft using Rangiora Airfield.
35. Being outside of controlled airspace Rangiora Airfield is an attractive stopping off point for aircraft transiting north and south. Fuel can be uplifted, and passengers take a break in a friendly country environment.

### **Flight Training**

36. Flight Training makes up a significant part of the airfield operations.
37. There are 5 organisations which provide flight training. These range from training recreational pilots for Microlight Pilot Certificates and Private Pilots Licenses through to Commercial Pilots Licenses and specific additional qualifications such as Agricultural ratings.
38. Rangiora Airfield is an ideal place for which to train new pilots as it is away from the congestion of Christchurch International Airport and controlled airspace.
39. The International Aviation Academy of NZ<sup>7</sup> which is based at Christchurch International Airport have indicated that they would consider moving to Rangiora when their lease expires at Christchurch.

### **Agricultural Operations**

40. Four agricultural aviation organisations are based at Rangiora. Two helicopters and two fixed wing operators, all servicing the wider rural area of the Waimakariri District.

### **Aircraft Maintenance**

41. There are 12 aircraft maintenance and support providers based on the Rangiora Airfield. These range from providing maintenance on recreational aircraft right up to highly sophisticated modern general aviation aircraft. These providers not only service aircraft based on the Rangiora Airfield but also aircraft from other regions and cover regular inspections right up to complete aircraft rebuilds.
42. Aircraft are required by law to be maintained in accordance with the manufacturer's instructions. This requires periodic inspections at required intervals specified by hours flown or on a predetermined calendar time. The cost of these inspections to the aircraft owner can vary from just a few hundred dollars to many thousands of dollars depending on the components

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<sup>7</sup> <https://flighttraining.co.nz/>

that need replacing or work done. This makes the maintenance providers an important part of the Rangiora aviation community.

### **Fuel Suppliers**

43. The two major fuel suppliers have fuel pumps on the airfield to supply avgas for piston engine aircraft and Jet A1 for turbine engine aircraft. Fuel burn for aircraft varies from around 19 litres an hour for a microlight up to close to 200 litres per hour for some helicopters. The fuel uplifted can be as much as three hundred litres at a time per aircraft.
44. Fuel is also supplied from these pumps to other operators in the region that are not based at Rangiora. This fuel is uploaded into tankers.
45. There is no supplier of Mogas (car fuel) which microlight aircraft commonly use. This is sourced from service stations in town.

### **On Field Employment**

46. It is estimated that the businesses on the Rangiora Airfield collectively employ some 60 people. The majority being employed by businesses supporting the aviation industry.

### **DM and AD Smith Investments Ltd Proposal**

47. The proposal by DM and AD Smith Investments Ltd (DASI) should be viewed as a beneficial collaboration between the WDC and DASI to create an aviation hub that would be the envy of many regions within NZ.
48. This private investment supports the WDC concept of creating a vibrant airfield to cater for the general aviation fraternity and will relieve pressure on the existing facilities at the Rangiora Airfield. It supports the Airfields vision of:

*Rangiora Airfield will develop and be recognised as a prominent airfield for a general aviation and associated businesses in the South Island'<sup>8</sup>*

49. The proposed development to build an Airpark is not a new concept. There are already several Airparks in New Zealand with North Shore (Dairy Flat), Whitianga, Pauanui, and Alexandra being examples which are well established, along with a Fernside Fields only a few kilometres away from Rangiora.

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<sup>8</sup> Airport Vision: Rangiora Airport Strategic Planning August 2007-Airbiz



## Proposal

50. The proposed DASI rezoning would enable the development of a mix of lots including:
- a) with enough room to build a residence with hangar
  - b) for hangars and some accommodation
  - c) standalone hangars lots and
  - d) lots which are more suitable for industrial activities, which will support the current and future demands of the resident aviation community.
51. In my opinion the DASI proposal would complement the Rangiora Airfield by allowing expansion all in the one area, with easy access to the airfield itself. The provision of the zone would ensure easy access to and from the potential hangar lots with separation between aircraft taxiways and vehicular access.
52. Many aircraft owners are semi-retired or retired persons with aviation being their hobby. The DASI development would enable these people to build a residence or have accommodation and house their aircraft all in the one place, saving on commuting times to the airfield and being in an environment which they are enthusiastic about.
53. Access from any development to the airfield would be by an agreement between the WDC and DASI or the individual site owners.

## Potential Benefits

### Economic Development

54. The Rangiora Airfield, like many small airfields around the country, runs at an operating loss after interest and depreciation. The revenue received from Landing Fees and Ground rentals does not cover the cost of running and maintaining the airfield, therefore is subsidised by the WDC. Additional aircraft movements from an Airpark would help by increasing the number of aircraft landings and therefore the landing fee revenue.
54. The DASI Airpark project aligns itself with the Waimakariri Economic Development Strategy 2024-34, of delivering demand driven services along with specialist skills and technology:

*While Council's role as an investor is important to provide critical infrastructure such as roading, utilities and community facilities, we know the bulk of the districts economic growth is driven by the private sector through their commercial developments and business activities<sup>9</sup>*

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<sup>9</sup> Page 32 Waimakariri Economic Development Strategy 2024-34.

56. The economic benefit of the Rangiora Airfield and the DASI Development can be categorized into three areas:
- i) Direct Benefit: Economic benefits derived from the actual spending incurred through the development of the Airpark. Development/upgrading of roading, services and airfield infrastructure plus the building of hangars and residences, plus increased rental and landing fees.
  - ii) Indirect Benefit: The benefit of increased activity for those firms and their employees who supply the businesses on the airfield and Airpark. Firms supporting the building of the Airpark will benefit from the extra activity.
  - iii) Induced Benefits: These are measured in terms of additional income that will be spent in the region due to increased business activity through those directly or indirectly employed by businesses and residents of the airfield and Airpark.

#### **Airfield Use and Employment**

57. Rangiora is unlikely to have a regular passenger transport service when Christchurch International Airport, a major airline hub, is only 30 minutes away by road. There would potentially be an opportunity for a third level operator to operate from Rangiora to a destination not serviced by the major carriers, so long as there was a sustainable demand.
58. Notwithstanding this, ad hoc charter operators currently operate into and out of Rangiora on a need to use basis using either single engine or light twin engine aircraft. For example, light aircraft often fly from the West Coast or remote high country sheep stations to Rangiora where aircraft can be left while people are on business in Rangiora or the wider region.
59. A completed Airpark would attract considerably more aircraft, in my opinion increasing activity to the Rangiora Airfield by adding a further 5,000 aircraft movements per annum and thus increasing the revenue of the airfield and potentially consumer spend in the region.
60. Based on the potential for airfield/aircraft related business to develop within the rezoned area I would anticipate that there is potential for upwards of 60 extra people to be employed within the Airpark. The Airpark would likely attract specialist businesses who deal with the general aviation industry as they will have easy access to an airfield for their customers. These are often high valued businesses that employ people who are specialists in their field. Some of these businesses may offer employment to people who are training to become licensed aircraft mechanical engineers (LAME) or specialists in their field.
61. The type of business I would anticipate include:

- i) General aircraft maintenance;
- ii) Engine and transmission overhaul facilities;
- iii) Aircraft Avionic installation and repairs;
- iv) Aircraft Painting; and
- v) Aircraft parts supplier.

### **Flight Training**

63. In addition to the above, in my opinion the rezoning would position the airfield to be able to attract a substantial flight training organisation. Apart from offices and lecture facilities, each student often needs accommodation. While students are generally domestic there are increasing numbers of international students learning to fly in New Zealand.
64. To provide some context, training for a Commercial Pilots licence with a Diploma of General Aviation will cost each student approximately \$90,000.00<sup>10</sup> and take approximately 2 years to complete. Further qualifications come at an added cost and can take a further year of training. There would also be broader multiplier effects for the wider community from having a flight training organisation onsite.

### **Residential Development**

65. The concept of the residential component of the airpark is essentially for residents fly themselves to the site, taxi to their house and park up in their hangar. Those living in such situations are well aware of the airfield and the associated amenity issues but chose to do so because they are aviation enthusiasts, enjoy the romance of aviation and want to be close to a recreational airfield and/or seek the convenience of living close to and housing their aircraft adjacent to the airfield which can be easily accessed and has available maintenance facilities.
66. The development such residential facilities at Rangiora provides not only for those seeking such access to an airfield but also for businesses who provide facilities for maintenance and refueling at the airfield and the airfield operator (WDC) in terms of landing fees.
67. In my opinion a residential component to the overall development will broaden the attraction of the airfield and help stimulate the development opportunities as well as helping in a financial sense the provision of service to the whole precinct.

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<sup>10</sup> International Aviation Academy of New Zealand -Website

## Conclusion

68. The Rangiora Airfield is a strategic asset to the region which has many functions, including as an alternative airfield in case of a civil emergency, as a home to aviation clubs and interest groups, as a maintenance and refueling facility, as a facility for commercial operations and as an important recreational flying base.
69. The development of an Airpark, whilst complementing the existing airfield, would enable increased development and employment opportunities, provide space for pent-up demand and increase the level of activity at Rangiora Airfield. In my opinion the proposal would provide a number of benefits for both the airfield and the wider community.