

FORM 5

**SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL
FOR POLICY STATEMENT OR PLAN, CHANGE OR VARIATION**

Clause 6 of Schedule 1, Resource Management Act 1991

To Queenstown Lakes District Council
Private Bag 50072
Queenstown 9348

Attention Proposed District Plan Submission

Name **Queenstown Airport Corporation (QAC)**

Address Queenstown Airport Corporation
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Dunedin 9054

1. **This is a submission on Stage 2 (and the associated variations to Stage 1) of the Proposed Queenstown Lakes District Plan (Proposed Plan).**
2. **QAC could not gain an advantage in trade competition through this submission.**
3. **The specific provisions of the proposal that QAC's submission relates to are:**
 - Chapter 2 Definitions
 - Chapter 7 Low Density Residential Zone
 - Chapter 17 Airport Mixed Use Zone
 - Chapter 21 Rural Zone
 - Chapter 25 Earthworks
 - Chapter 29 Transport
 - Chapter 31 Signs
 - Chapter 38 Open Space and Recreation Zone

4. QAC's submission is:

Queenstown Airport – An Overview

- 4.1 Queenstown Airport is the main airport in the Queenstown Lakes District and is the primary take-off and landing point for much of the aircraft activity in the District. The Airport accommodates aircraft movements associated with scheduled, general aviation and helicopter operations. Queenstown Airport acts as an essential gateway to the Queenstown Lakes District and facilitates access to the District and economic activity in the local and regional economies.
- 4.2 Queenstown Airport is the fourth busiest airport in New Zealand (in terms of passenger numbers) and is the busiest airport in the lower South Island. For the past five years, the Airport has experienced significant growth in passenger numbers of 12 % compound annual growth. In the 12 months to the end of December 2017, the airport accommodated over 2 million passengers or a 13% increase in passengers from the previous year. Recent forecasts show no sign of this growth slowing, with passenger numbers forecast to reach 5.1 million passengers per year by 2045.
- 4.3 Queenstown Airport is managed by QAC. QAC is a network utility operator and a requiring authority under section 166 of the Resource Management Act 1991 (the RMA or the Act).
- 4.4 The Airport is the subject of three designations in the operative Queenstown Lakes District Plan (Operative Plan), namely:
- 4.4.1 Designation 2 – Aerodrome Purposes: The purpose of this designation is to protect the operational capability of the Airport, while at the same time minimising adverse environmental effects from aircraft noise on the community at least to year 2037;
- 4.4.2 Designation 3 – Air Noise Boundary: This designation defines the location of the Air Noise Boundary (ANB). The location of the ANB shown in the designation is outdated however, and was updated to provide for airport operations until 2037 via noise boundaries promulgated as part of Plan Change 35; and,
- 4.4.3 Designation 4 – The Approach and Land Use Control (transitional slopes and surfaces): The purpose of this designation is to provide obstacle limitation surfaces around the Airport to ensure the safe operation of aircraft approaching and departing the Airport.
- 4.5 Excepting Designation 3, these designations are proposed to be “rolled over” (with modifications), in the Proposed Plan (Stage 1).

- 4.6 QAC is also a provider of emergency services and is a lifeline utility (specific entity) under the Civil Defence Emergency Management Act 2002 (CDEM 2002).

Wanaka Airport – An Overview

- 4.7 Wanaka Airport accommodates aircraft movements associated with scheduled, general aviation and helicopter operations, and is a major facilitator of commercial helicopter operations within the District.
- 4.8 The Queenstown Lakes District Council (QLDC) is the requiring authority for Wanaka Airport, with QAC managing the operations of the Airport on QLDC’s behalf.
- 4.9 Wanaka Airport is designated for “Aerodrome Purposes” (Designation 64) and for “Approach and Land Use Control” purposes (Designation 65) in the Operative Queenstown Lakes District Plan. The purpose of these designations is to:
- Protect the operational capability of the Airport, while at the same time minimising adverse effects from aircraft noise (Designation 64); and,
 - Define essential airport protection measures, transitional slopes and surfaces, aircraft take off climb and approach slopes, and airport height and obstacle clearances (Designation 65).

Queenstown Airport as a facilitator of economic growth and wellbeing

- 4.10 Queenstown Airport serves an important role in facilitating the movement of people and goods, which in turn feeds the District’s tourism industry and commerce more generally. Queenstown Airport is the primary arrival and departure port for many visitors to the District.
- 4.11 For the year ending December 2017, Queenstown Airport accommodated in excess of 2 million passengers. Recent growth projections have indicated that passenger growth is set to continue, with 5.1 million passengers forecast by 2045¹.
- 4.12 To help determine how best to accommodate this growth, in August 2016, QAC issued the *Queenstown Airport Master Plan Options* report. This report describes the demand forecasts and targeted growth forecasts for Queenstown Airport over the next 30 years and identified three airport options for accommodating that growth. It also evaluated the benefits of enabling growth of the airport.
- 4.13 Based on forecast growth of up to 5.1 million passengers per annum, the Master Plan Options document reports that tourism spend by Queenstown Airport passengers is

¹ Based on projections reported in the *Queenstown Airport Master Plan Options* report, released November 2016.

forecast to increase from \$849 million per year to \$3,580 million by 2045. A corresponding 5.5% increase in employment growth is forecast over this same timeframe. The on-going ability of Queenstown Airport to function and grow without undue constraint is therefore of significant importance to the tourism industry and will have substantial flow-on effects for the social and economic wellbeing of the community.

NZ Standard and Plan Change 35

- 4.14 In 2008 QAC promulgated Plan Change 35 (PC35). The purpose of PC35 was to put in place an appropriate management regime for land use around Queenstown Airport while providing for the predicted ongoing growth of the Airport. Accordingly, the Plan Change updated the Airport's noise boundaries (Air Noise Boundary (ANB) and Outer Control Boundary (OCB)) to provide for predicted growth in airport operations to 2037, and amended various zone provisions relating to land within those updated boundaries likely to be affected by increased airport noise.
- 4.15 The foundation of the approach adopted in PC35 was the New Zealand Standard for airport noise management and land use planning (the NZ Standard or NZS6805). This Standard is recognised as the key guiding document for managing aircraft noise at New Zealand airports. The NZ Standard establishes maximum acceptable levels of aircraft noise exposure around airports for the protection of community health and amenity values, whilst recognizing the need to operate an airport efficiently.
- 4.16 As the primary guiding document for the management of aircraft noise and land use planning in New Zealand, QAC submits that it is imperative that the Proposed Plan upholds the approach used in the NZ Standard and PC35.

Visitor Accommodation

- 4.17 QAC is interested in the proposed variation relating to Visitor Accommodation insofar that it could potentially give rise to adverse reverse sensitivity effects for Queenstown and Wanaka Airports.
- 4.18 The proposed variation removes the terms "Residential Visitor Accommodation" and "Homestay" from the definitions of "Residential Activity" and "Visitor Accommodation". As a consequence, Homestay and Residential Visitor Accommodation activities are no longer captured by the definition of Activities Sensitive to Aircraft Noise (ASAN). Despite their noise sensitive nature, the provisions applying to ASAN will no longer apply to these two activities.
- 4.19 In light of the changes made to the definitions of Visitor Accommodation and Residential Activity, QAC submits that a consequential change is required to the definition of ASAN to ensure it adequately captures Homestay and Residential Visitor Accommodation activities

and thus maintains the planning framework first established under PC35 and subsequently included within Stage 1 of the Proposed Plan review.

Chapter 25 Earthworks

- 4.20 QAC recognises that earthworks are a necessary part of subdivision and development and as such, support the social and economic wellbeing of the community. QAC therefore considers that it is appropriate for such benefits to be recognised in the Proposed Plan.
- 4.21 QAC is concerned however, that poorly managed earthworks can give rise to a range of adverse effects, including potentially significant and adverse effects for aircraft on approach or departure from Queenstown and Wanaka Airports. QAC therefore supports the inclusion of provisions in the Proposed Plan which give consideration to the effects of earthworks on the operation and safety of Queenstown and/or Wanaka Airports.

Chapter 29 Transport

- 4.22 Queenstown Airport has a significant role in facilitating the movement of people and goods to the Queenstown Lakes District and the wider Otago Region. Wanaka Airport also has a similar role, albeit to a less extent. QAC submits that these functions should therefore be recognised in the Proposed Plan.
- 4.23 The operative District Plan contained a series of objectives and policies specifically relating to Queenstown and Wanaka Airports. By contrast, the proposed new Transport chapter does not afford any recognition to either airport. Loose affiliations to the airports' role in the District cannot even be drawn from use of broad terms such as "Transport Infrastructure" or "Transport Network", as such terms have been defined and do not include any reference to the airports or their functions.
- 4.24 On review of the section 32 evaluation, no evaluation of the costs or benefits of this change has been undertaken, nor has any justification been provided for the significant departure from the operative District Plan approach (insofar as it relates to the airports).
- 4.25 QAC acknowledges that the strategic significance of Queenstown and Wanaka Airports is recognised in Chapters 3 and 17 of the Proposed District Plan², with the significance of Queenstown Airport also further recognised in Chapter 4. While QAC does not consider it necessary to include a further suite of objectives and policies into the Transport chapter that restate the strategic significance of Queenstown and Wanaka Airports, QAC submits that it would be appropriate to recognise the Airports' transportation role in the purpose statement and cross reference back to Chapters 3, 4 and 17 as appropriate.

² Based on the Right of Reply version of Chapter 17 of the Proposed Plan (Stage 1).

Chapter 31 Signage

- 4.26 Signage is an important and commonly found feature within any airport environment. It assists with both airside and landside airport operations, and assists with the safe and efficient movement of people, aircraft and traffic through the airport's airside and landside facilities. Signage also provides an opportunity to showcase the activities or services on offer within the District, which has both social and economic benefits for the wider community. QAC therefore submits that it is important that the Proposed Plan recognises and provides for signage within the airport environment.
- 4.27 QAC submits that it would be efficient and effective for signage at Queenstown and Wanaka Airports to be provided for by way of permitted activity where the effects of the signage are internalised to the site. QAC also submits that such signage should be exempt from compliance with the development standards described in Chapter 31.
- 4.28 QAC accepts however, that it is appropriate to impose restrictions on signage at the interface of Queenstown and Wanaka Airports with adjacent zones. In this regard, QAC supports the provisions of Chapter 31 insofar as they apply to the signage located along the interface of the Airport boundaries with adjacent zones.
- 4.29 Signage within the wider Airport Zone (at Queenstown and Wanaka Airports) was addressed during the Hearing Stream 8 (Chapter 17), Stage 1 of the Proposed Plan. QAC does not wish to relitigate this topic via this hearing. QAC submits that some amendments are required to Chapter 31 however to ensure that it is clear that Chapter 17 prevails over Chapter 31.

Chapter 38 Open Space and Recreation

- 4.30 All Council owned and administered reserves are proposed to be rezoned to a newly established "Open Space and Recreation Zone". The purpose of this zone is to *"...enable recreation activities and provide for associated infrastructure while protecting, maintaining and enhancing landscape values, nature conservation values, ecosystem services and amenity"*.
- 4.31 The proposed new zone is comprised of five parts, including:
- The Nature Conservation Zone;
 - The Informal Recreation Zone;
 - The Active Sport and Recreation Zone;
 - The Civic Spaces Zones; and,
 - The Community Purpose Zone which includes three sub zones to manage cemeteries, golf and camping grounds.

4.32 A number of reserves located within close proximity to Queenstown Airport are proposed to be rezoned from “Rural General” in the operative District Plan to Open Space and Recreation Zone in the Proposed District Plan. The following areas are of interest to QAC:

- 4.32.1 The area of land proposed to be zoned for “Informal Recreation” purposes at the end of the Runway End Safety Area (RESA);
- 4.32.2 The area of land currently occupied by the Queenstown Events Centre and surrounding sports fields proposed to be zoned for “Community Purposes”;
- 4.32.3 The area of land currently occupied by the Frankton Camping Ground and proposed to be zoned “Community Purpose – Campground”; and,
- 4.32.4 The areas of reserves located along the edge of Lake Wakatipu and the Kawarau River, as well as other “pockets” of reserve located on Frankton Flats and Shotover Country are proposed to be zoned for “Informal Recreation” and located within the PC35 Aircraft Noise Boundaries.

PC 35 and Reverse Sensitivity Effects

4.33 QAC is concerned that the rezoning of the areas of land described in paragraphs 4.32.1 to 4.32.4 have the potential to give rise to adverse reverse sensitivity on Queenstown Airport. This is inconsistent with PC35 and the recommended planning framework described in the New Zealand Standard for airport noise management and land use planning (the NZ Standard).

4.34 In the absence of a planning regime which appropriately manages potential reverse sensitivity effects on QAC, and in accordance with PC35 and the NZ Standard, QAC opposes the proposed rezoning of land described in paragraphs 4.32.1 to 4.32.4.

Operational and Health and Safety Concerns

4.35 QAC submits that the range of activities enabled within the proposed new zones could potentially give rise to adverse health and safety effects for users of both the reserves and Queenstown Airport.

Height Limits

4.36 As noted earlier, QAC holds an “Approach and Land Use Control” designation for Queenstown Airport. The purpose of this designation is to provide obstacle limitation surfaces around the Airport to ensure the safe operation of aircraft approaching and departing the Airport. This is achieved by means of height controls based on a series of geometric surfaces projecting up from the edges of the strips which surround the runways.

The designation seeks to prevent objects such as structures and trees from penetrating these surfaces in areas critical to operational safety and efficiency.

- 4.37 In accordance with section 176 of the Act, the designations should be sufficient to control the extension of buildings and structures into these surfaces. QAC's experience dictates however, that the statutory obligations to obtain QAC's approval under section 176 of the Act is often overlooked when considering applications for resource consent.
- 4.38 QAC therefore submits that it would be prudent to include a new advice note into the proposed Open Space and Recreation Zone chapter which draws plan users' attention to the requirements inherent in the designation. This is particularly relevant for the proposed new "Community Purpose" reserve located to the north of Queenstown Airport, as the permitted height limit for buildings and structures within this area is greater than the height limits permitted by the designation.
- 4.39 In addition, QAC submits that the height limits at the Queenstown Events Centre should align with the restrictions imposed by the designation.

Setbacks

- 4.40 Civil Aviation Regulations require that, for security purposes, buildings and structures are setback from airside security fences by at least 1.5m to avoid potential unauthorised access to airside facilities at Queenstown Airport. Civil Aviation Regulations also require that rescue fire access within airside facilities is maintained at all times.
- 4.41 Within the last year, QAC has taken enforcement action under the Civil Aviation Act 1990 to resolve situations relating the above. QAC therefore supports the inclusion of minimum setback within the Open Space and Recreation Zone as it proactively manages such situations and minimises their chance of occurrence.
- 4.42 QAC submits that all buildings and structures within the zone should achieve a minimum setback of at least 1.5m where it adjoins the Airport Zone. Failure to comply should attract a non-complying activity status.

Lighting and Glare

- 4.43 Inappropriately managed lighting in close proximity to Queenstown Airport has the potential to give rise to adverse lighting and glare effects, particularly for pilots on approach or departure from Queenstown Airport. QAC therefore supports the inclusion of the proposed lighting and glare standards as it will minimize adverse glare effects.

Shotover Delta Informal Recreation Zone

- 4.44 The new informal recreation reserve located within the Shotover Delta could potentially encourage the intensification of recreational activities at the end of the Queenstown Airport RESA. QAC submits that this is inappropriate and poses a significant safety risk to zone users in the event of an aircraft under or overshoot at Queenstown Airport.
- 4.45 Furthermore, QAC submits that activities establishing in this area will be subjected to high levels of aircraft noise during aircraft take-off and landing.
- 4.46 QAC is also concerned about the potential for conservation planting to attract birds to the area, increasing the chance of bird strike. This poses a potentially significant risk to aircraft on approach and departure. QAC therefore opposes conservation planting in this area and submits that it should only be permitted if an appropriate list of plant species is identified that will not attract birds to the site.
- 4.47 QAC submits that either the operative Rural zoning should remain, or alternatively, a significantly reduced range of activities should be provided for within this part of the Informal Recreation Zone.

Conclusion

- 4.48 In addition to the above, various other amendments, as detailed in **Annexure A**, are required to ensure that Queenstown and Wanaka Airports are appropriately recognised and provided for in the Proposed District Plan.
- 4.49 QAC considers that in the absence of amendments to the Proposed Plan to address and give effect to the above submission points and those set out in **Annexure A**:
- 4.49.1 The Proposed Plan will not promote the sustainable management or efficient use and development of natural and physical resources;
- 4.49.2 The Proposed Plan is not the most appropriate way to achieve the purpose of the RMA, particularly when having regard to the efficiency and effectiveness of the provisions relative to other means;
- 4.49.3 The Proposed Plan does not appropriately fulfil the requirements of section 32 of the RMA, particularly in terms of the evaluations of the costs of implementing the provisions under section 32(2)(a); and,
- 4.49.4 The Proposed Plan does not represent sound resource management practice particularly with respect to planning for airports in the Queenstown Lakes District.

4.50 QAC's submission points are addressed in further detail, and additional points are made in **Annexure A**, which is attached to and forms part of this submission.

5. QAC seeks the following decision from the local authority:

5.1 That the submission points contained in section 4 and **Annexure A** which is attached to and forms part of this submission be accepted, or that the Proposed Plan be amended in a similar or such other way as may be appropriate to address QAC's submission points; and

5.2 Any consequential changes, amendments or decisions that may be required to give effect to the matters raised in QAC's submission.

6. QAC wishes to be heard in support of its submission.

6.1 If others make a similar submission, QAC would be prepared to consider presenting a joint case with them at any hearing.

Signature:



Rachel Tregidga

General Manager, Property and Planning, Queenstown Airport Corporation

Dated at Queenstown this 23rd day of February 2018

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APPENDIX A

Table of Plan Provisions

Appendix A

CHAPTER 2 – DEFINITIONS (VISITOR ACCOMMODATION - VARIATION TO STAGE 1 PDP)			
Provision	Position	Reason for the Submission	Relief Sought
Activity Sensitive to Aircraft Noise	Oppose	Refer to paragraphs 4.14 to 4.19 of QAC's submission.	<p>Amend the definition of Activity Sensitive to Aircraft Noise to include Homestay and Residential Visitor Accommodation as follows:</p> <p><i>Means any residential activity, <u>homestay, residential visitor accommodation, visitor accommodation activity, community activity and day care facility activity as defined in this District Plan including all outdoor spaces associated with any educational activity, but excludes activity in police stations, fire stations, courthouses, probation and detention centres, government and local government offices.</u></i></p>
CHAPTER 7 LOW DENSITY RESIDENTIAL (VISITOR ACCOMMODATION - NEW STAGE 2 PDP PROVISIONS, ADDED TO STAGE 1)			
Provision	Position	Reason for the Submission	Relief Sought
<p>Rule 7.4.17</p> <p><u>Visitor Accommodation in the Low Density Visitor Accommodation Sub-Zone: RD*</u></p> <p>*Discretion is restricted to consideration of all of the following:</p> <ul style="list-style-type: none"> ➤ The location, nature and scale of activities; ➤ The location, provision, and screening of parking and access; ➤ Landscaping; ➤ Noise generation and methods of mitigation (through design and management controls); ➤ Hours of operation, including in respect of ancillary activities; <p>The external appearance of buildings, including design, materials and external lighting, and design measures to limit the impact on adjoining residential activities.</p>	Oppose	Visitor Accommodation has the potential to expose a large number of people to the effects of aircraft noise if the duration of stay is greater than two to three days. QAC therefore submits that it would be prudent to include, new matters of discretion which provide for the consideration of reverse sensitivity effects at Queenstown Airport.	<p>Delete the rule or insert the following additional matters of discretion:</p> <p><i>Rule 7.4.17</i></p> <p>.....</p> <p><i>Discretion is restricted to consideration of all of the following:</i></p> <ul style="list-style-type: none"> ➤ <i>The external appearance of buildings, including design, materials and external lighting, and design measures to limit the impact on adjoining residential activities.</i> ➤ <i>....</i> ➤ <i>Reverse sensitivity effects on Queenstown Airport arising from the location of the visitor accommodation within the Outer Control Boundary.</i> ➤ <i>The level of aircraft noise exposure, the provision of outdoor space and the associated effects on guest amenity.</i>

Rule 7.4.18

Support

Refer to paragraphs 4.14 to 4.19 of QAC's covering submission.

Retain the rule as notified.

Visitor Accommodation not otherwise identified: NC

CHAPTER 25 EARTHWORKS

Provision	Position	Reason for the Submission	Relief Sought
<p>Objective 25.2.1</p> <p>Policy 25.2.1.1</p> <p>Policy 25.2.1.2</p> <p>Objective 25.2.2</p> <p>Policy 25.2.2.1</p> <p>Policy 25.2.2.2</p> <p>Policy 25.2.2.3</p>	Support	Refer to paragraphs 4.20 to 4.21 of QAC's covering submission.	Retain as notified.
<p>Advice Note 25.3.3.5: Those who wish to undertake earthworks in the vicinity of Queenstown Airport or Wanaka Airport are referred to Figures 1 to 4 of the Planning Maps which identify the Airport Approach and Protection Measures, and Airport Protection Inner Horizontal and Conical Surfaces for Queenstown Airport and Wanaka Airport. Land use restrictions within these areas are further described in Chapter 37: Designations, Parts D.3 and E.2. Persons who wish to undertake earthworks are advised to consult with the relevant requiring authority and the Civil Aviation Authority.</p>	Support	Refer to paragraphs 4.20 to 4.21 of QAC's covering submission.	Retain as notified.
<p>Rule 25.4.1</p> <p>Earthworks that comply with all of the activities and standards in Table 25.1 to 25.3.</p> <p>Rule 25.4.2</p> <p>Earthworks that do not comply with the volume of earthworks standards in Table 25.2.</p> <p>Discretion is restricted to the matters set out in Par 25.7.</p>	Support	Refer to paragraph 4.22 of QAC's covering submission.	Retain as notified.
<p>Rule 25.5.5</p> <p>Queenstown Airport Mixed Use Zone: 500m³</p> <p>Rule 25.5.6</p> <p>Rural Zone: 1000m³</p>	Oppose	Refer to paragraph 4.22 of QAC's covering submission.	<p>Rule 25.5.5</p> <p>Queenstown Airport Mixed Use Zone: 500m³</p> <p>Rule 27.5.7A</p> <p>Airport Zone: 2500m³</p>

Or any alternative required to ensure that both Wanaka and Queenstown Airports have a maximum permitted earthworks volume of 2500m³ per site.

<p>Rule 25.5.14</p> <p>Any person carrying out earthworks shall implement dust control measures to minimise nuisance effects of dust beyond the boundary of the site.</p> <p>Non-compliance: NC</p>	<p>Support</p>	<p>Refer to paragraphs 4.20 to 4.21 of QAC's covering submission.</p>	<p>Retain as notified.</p>
<p>25.7 Matters of Discretion</p> <p>For all restricted discretionary activities discretion shall be restricted to the following matters. These matters are also applicable to any discretionary or non-complying activity.</p> <ul style="list-style-type: none"> a. Soil erosion, generation and run-off of sediment. b. Landscape and visual amenity. c. Effects on infrastructure, adjacent sites and public roads. d. Land stability. e. Effects on water bodies, ecosystem services and indigenous biodiversity. f. Cultural and archaeological sites. g. Nuisance effects. h. Natural Hazards. <p>Functional aspects and positive effects.</p>	<p>Support</p>	<p>Refer to paragraphs 4.20 to 4.21 of QAC's covering submission.</p>	<p>Retain as notified.</p>
<p>25.8 Assessment Matters</p> <p>25.8.4 Effects on infrastructure, adjacent sites and public roads 25.8.8 Nuisance effects</p> <p>25.8.10 Functional aspects and positive effects</p>	<p>Support</p>	<p>Refer to paragraphs 4.20 to 4.21 of QAC's covering submission.</p>	<p>Retain as notified.</p>

Variation to Stage 1 PDP Definitions			
Provision	Position	Reason for Submission	Relief Sought
<p>Regionally Significant Infrastructure: Means:</p> <ul style="list-style-type: none"> ➤ <u>renewable electricity generation facilities, where they supply the National Grid and local distribution network and are operated by an electricity operator; and</u> ➤ <u>electricity transmission infrastructure forming the National Grid;</u> 	<p>Support</p>	<p>QAC supports the inclusion of Queenstown and Wanaka Airports in the definition of "Regionally Significant Infrastructure.</p> <p>QAC notes that minor amendments are required to the definition however to remove the inconsistent use of the conjunction "and".</p>	<p>Retain as notified, subject to the following minor grammatical amendments:</p> <p>Regionally Significant Infrastructure: Means:</p> <ul style="list-style-type: none"> ➤ renewable electricity generation facilities, where they supply the National Grid and local distribution network and are operated by an electricity operator; and

- electricity Distribution Lines identified on the Planning Maps; and
- telecommunication and radio communication facilities*; and
- municipal infrastructure**; and
- roads classified as being of national or regional importance; and
- Queenstown and Wanaka airports.

* As defined by the Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016.

** As defined by the Otago Regional Policy Statement 2015.

- electricity transmission infrastructure forming the National Grid;
- electricity Distribution Lines identified on the Planning Maps; ~~and~~
- telecommunication and radio communication facilities*; ~~and~~
- municipal infrastructure**; ~~and~~
- roads classified as being of national or regional importance; ~~and/or,~~
- Queenstown and Wanaka airports.

* As defined by the Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016.

** As defined by the Otago Regional Policy Statement 2015.

CHAPTER 29 TRANSPORT

Provision	Position	Reason for Submission	Relief Sought
<p>29.1 Purpose</p> <p>The purpose of this chapter is to manage works within the road, manage the development of transport infrastructure both on and off roads, and to require that landuse activities are undertaken in a manner that maintains the safety and efficiency of the transport network as a whole and contributes positively to improving the public and active transport networks.</p> <p>A well-managed transport network needs to be safe and efficient, and provide for all modes of transport. As a result, it will facilitate compact and efficient landuse, which will contribute positively to limit increases in the use of fossil fuels and greenhouse gas emissions.</p>	Oppose	Refer to paragraphs 4.23 to 4.26 of QAC's covering submission.	<p>Amend the Purpose statement to include the following additional paragraph:</p> <p><u>While Queenstown and Wanaka Airports also have an important role facilitating the movement of people and goods to the District, these functions are recognised in Chapters 3, 4 and 17 and are therefore not repeated here.</u></p>
<p>New 29.3.2 Advice Notes - General</p>		<p>Chapter 17 of the Proposed Plan contains provisions relating car parking at Queenstown Airport. Such matters were traversed during Hearing Stream 8 (Stage 1) of the Proposed Plan.</p> <p>To avoid relitigating such matters and to ensure it is clear to Plan users which provisions take precedent, QAC submits that it is necessary to insert a new advice note which confirms that Chapter 17 takes precedent.</p>	<p>Insert a new advice note as follows:</p> <p><u>29.3.2.4</u></p> <p><u>Where inconsistency arises between the transport provisions of Chapter 17 and Chapter 29, Chapter 17 shall prevail.</u></p>

<p>Rule 29.4.9</p> <p>Rental vehicle businesses in all zones where commercial activities are permitted: RD</p> <p>Discretion is restricted to:</p> <ul style="list-style-type: none"> ➤ Effects on the safety and efficiency of the transport network, resulting from rental vehicles being parked on roads and other public land when not in use. ➤ Effects on amenity from rental vehicles being parked on roads and other public land when not in use. ➤ The amount, location, and management of the vehicle parking/ storage proposed, including the location, accessibility, and legal agreements where parking is not proposed on the same site as the office and reception area. 	Oppose	<p>Rental vehicles are a common feature at airports throughout New Zealand and provide an important service for passengers. They have therefore been provided for by way of permitted activity in Chapter 17 of the Proposed Plan. Chapter 17 was heard during Hearing Stream 8 (Stage 1) of the Proposed Plan.</p> <p>To avoid relitigating matters addressed during Stage 1, QAC submits that an amendment is required to this rule to clarify that it does not relate to activities undertaken in the Airport Zone.</p>	<p>Delete the rule or amend the rule as follows to exclude rental vehicle businesses in the Airport Zone:</p> <p>Rule 29.4.9:</p> <p>Rental vehicle businesses in all zones, <u>excluding the Airport Zone</u>, where commercial activities are permitted: RD</p>
<p>Rule 29.5.12 Lighting of parking areas</p> <p>a. Excluding parking areas accessory to residential activity, where a parking area provides for 10 or more parking spaces, which are likely to be used during the hours of darkness, the parking and manoeuvring areas and associated pedestrian routes shall be adequately lit.</p> <p>b. Such lighting shall be designed in accordance with the Queenstown Lakes District Council Southern Light Part One - A Lighting Strategy (March 2017) and Queenstown Lakes District Council Southern Light Part Two – Technical Specifications (March 2017).</p> <p>c. Such lighting shall not result in a greater than 10 lux spill (horizontal or vertical) of light onto any adjoining site within the Business Mixed Use Zone, the Town Centre zones, and the Local Shopping Centre Zone, measured at any point inside the boundary of any adjoining site or greater than 3 lux spill (horizontal or vertical) of light onto any adjoining site that is zoned High Density Residential, Medium Density Residential, or Low Density Residential measured at any point more than 2m inside the boundary of the adjoining site.</p> <p>Discretion is restricted to:</p> <ul style="list-style-type: none"> ➤ Effects on the safety and amenity of pedestrian, cyclists, and motorists using the parking area. ➤ Effects from the lighting on adjoining sites. 	Oppose	<p>Inappropriately managed lighting in close proximity to Queenstown Airport has the potential to give rise to adverse lighting and glare effects, particularly for pilots on approach or departure from Queenstown Airport.</p>	<p>Amend subparagraph (c) as follows:</p> <p>c. Such lighting shall not result in a greater than 10 lux spill (horizontal or vertical) of light onto any adjoining site within the Business Mixed Use Zone, the Town Centre zones, and the Local Shopping Centre Zone, measured at any point inside the boundary of any adjoining site or greater than 3 lux spill (horizontal or vertical) of light onto any adjoining site that is zoned High Density Residential, Medium Density Residential, or Low Density Residential <u>or Airport/Airport Mixed Use</u> measured at any point more than 2m inside the boundary of the adjoining site.</p>

Rule 29.4.10 High Traffic Generating Activities

Oppose

Any landuse or subdivision activity that exceeds the traffic generation standards set out in Table 29.6.

Discretion is restricted to:

- Effects on the transport network, including as a result of:
 - any proposed travel planning, provision of alternatives to private vehicle, or staging of development;
 - any proposed improvements to the local transport network within or beyond the site, including proposed additions or improvements to the active and public transport network and infrastructure and the roads themselves, in accordance with Council standards and adopted infrastructure network development plans either within or beyond the site. This may be required by direct construction activities, or by collecting funds towards a wider project that would achieve the modal shift aim of the specific development, as promoted in the application;
 - the amount, design, and location of cycle parking, e-bicycle charging areas, showers, changing rooms and lockers provided;
 - the amount of accessory parking and any non-accessory parking proposed; and
 - the design of the site and/ or its frontage in regard to its ability to accommodate any proposed public transport infrastructure proposed by Council;
 - the provision or upgrading of pedestrian and cycle infrastructure; and
 - the provision of a Travel Demand Management Plan.

Airports are inherently busy environments that facilitate the movement of large numbers of people to and from the District. A range of land use activities can be found within an Airport environs that support this function.

QAC submits that as drafted, this rule is difficult to implement in an Airport setting. Specifically:

- the airport already exceeds all of the traffic generation standards set out in Table 29.6 and arguably any intensification in land use activity would trigger the rule each time such an intensification occurred;
- it is not clear how the standards are to be applied. For example, one interpretation is that a new resource consent would be triggered for every new activity at the airport, irrespective of the nature or scale of the activity due to the Airport's existing exceedance of the standards in Table 29.6;
- Airports facilitate the movement of people to and from the District. Many of the activities undertaken at airports are purely intended to support this function and provide services for passengers, staff and "meeters and greeters". They are therefore not vehicle generating activities in of themselves.
- As drafted, it is difficult to distinguish between the facilitating and generating function of the airport.

Furthermore, QAC submits that it has concerns regarding the matters of discretion. Specifically;

- Development contributions will be collected for new developments, therefore creating a duplication in funds collected for transportation initiatives;
- Even if pedestrian and cycle infrastructure is provided at the Airport, due to the characteristics of passengers (i.e. typically carrying luggage), such facilities are typically not utilised to any significant extent.

Delete the rule; or,

Amend the rule to provide an exemption for Airport and Airport Related activities located within the Airport Zone from complying with this rule.

Chapter 31 Signs			
Provision	Position	Reason for the Submission	Relief Sought
31.4 Clarification	Oppose	Refer to paragraphs 4.27 to 4.30 of QAC's covering submission.	Insert a new advice note clarifying the relationship between Chapters 17 and 31 of the Proposed Plan as follows: f. <u>The rules in this chapter do not apply to signage located in the Airport Zone which complies with Rule 17.4.2 or Rule 17.4.23.</u>
31.5 Rules – Activities			
31.6 Rules – General Standards			
31.7 Rules – Standards for Signs in Commercial Areas (insofar as it relates to the Airport Mixed Use Zone)			

31.9 Rules – Standards for Signs in Other Areas

(insofar as it relates to Wanaka Airport and its location in the Rural Zone).

In the event that decisions on Stage 1 of the Proposed Plan remove signage from Chapter 17 of the Proposed Plan or exclude Wanaka Airport from the Airport Zone, introduce a new rule into Chapter 31 which permits signage and exempts compliance with the relevant standards (Rules 31.5, Rule 31.7 and 31.9) in the following zones (as relevant following the release of decisions on Stage 1 of the Proposed Plan):

- the Airport Zone;
- the Queenstown Airport Mixed Use Zone;
- the Rural Zone (only insofar as it relates to Wanaka Airport, as defined by the extent of the designation boundary as of 23 February 2018).

OPEN SPACE AND RECREATION ZONE			
Provision	Position	Reason for the Submission	Relief Sought
<p><u>New Objective 38.2.5</u></p> <p><u>New Policy 38.2.5.1</u></p> <p><u>New Rule 38.9.3.8</u></p>		Refer to paragraphs 4.34 to 4.35 and 4.43 of QAC’s covering submission.	<p>Insert new Zone wide objectives, policies and methods that maintain the planning framework established under Plan Change 35.</p> <p>QAC recommends that the following provisions (or similar) be introduced into the chapter:</p> <p><u>Objective 38.2.5</u></p> <p><u>Queenstown Airport is protected from the reverse sensitivity effects of Activities Sensitive to Aircraft Noise.</u></p> <p><u>Policy 38.2.5.1</u></p> <p><u>To prohibit the location of any new Activity Sensitive to Aircraft Noise on Open Space and Recreation zoned land within the Air Noise Boundary or Outer Control Boundary for Queenstown Airport.</u></p> <p><u>Rule 38.9.38</u></p> <p><u>Activities Sensitive to Aircraft Noise within the Air Noise Boundary or Outer Control Boundary at Queenstown Airport: PR (in all zones)</u></p>
<p>Policy 38.2.2.2</p> <p>Limit activities, buildings and structures to those compatible with the role and function of the zone and are necessary to maintain or enhance the anticipated use or values of the zone.</p>	Oppose	Refer to paragraphs 4.34 to 4.37 of QAC’s covering submission.	<p>Amend Policy 38.2.2 as follows:</p> <p>Policy 38.2.2.2</p> <p>Limit activities, buildings and structures to those <u>that are:</u></p>

<p>Objective 38.4.1</p> <p>Use and development for informal recreation maintains and enhances the environment.</p> <p>Policy 38.4.1.5</p> <p>Limit the intensity of activities to minimise adverse effects such as noise, glare and traffic on amenity values, peace and enjoyment of the Informal Recreation Zones and surrounding environment.</p>	<p>Support</p>	<p>QAC submits that it is appropriate to minimise adverse effects on surrounding environments (such as Queenstown Airport) by limiting the intensity of activities that could potentially have an adverse effect on the safety and wellbeing of aircraft and their passengers (when flying overhead) or persons using the Informal Recreation Zone.</p>	<p>a. compatible with the role and function of the zone; and are</p> <p>b. <u>compatible with the sensitivity of the surrounding environment and zones; and,</u></p> <p>necessary to maintain or enhance the anticipated use or values of the zone.</p> <p>Retain the objective and policy as notified.</p>
<p>New Clarification – Advice Note 38.8.2.11</p> <p>Or</p> <p>New Rule 38.2.10.11 (Standard) relating to height limits within Designation 4.</p>		<p>Refer to paragraphs 4.37 to 4.40 of QAC’s covering submission.</p>	<p>Insert a new advice note as follows:</p> <p><u>38.8.2.11 Activities, buildings and structures proposed to be established within the vicinity of Queenstown Airport are referred to Figures 1 and 2 of the Planning Maps which identify the Airport Approach and Protection Measures, and Airport Protection Inner Horizontal and Conical Surfaces for Queenstown Airport. Land use restrictions associated within these areas are further described in Chapter 37: Designations, Part D.3. Persons who wish to undertake activities or develop buildings or structures which enter into these surfaces are advised to consult with the relevant requiring authority and the Civil Aviation Authority.</u></p> <p>Or;</p> <p>Insert new height limits for structures within the Queenstown Events Centre Community Purposes Zone.</p>
<p>38.10.4 Setback from Internal and Road Boundaries</p> <p>Setback from internal boundaries</p> <p>38.10.4.1 Where a site adjoins another zone, buildings shall be setback from the boundary the same distance as required by the set back from internal boundaries of the adjoining zone.</p>	<p>Oppose</p>	<p>Refer to paragraphs 4.41 to 4.43of QAC’s covering submission.</p>	<p>➤ That a new rule be inserted in the zone rules that requires all buildings and structures to be setback at least 1.5m where it adjoins the Airport Zone.</p>

Non Compliance Status: RD

Discretion is restricted to the following:

- Building dominance;
- Privacy effects on adjoining properties; • Access to sunlight and impacts on shading;
- Effects on visual amenity;
- The size, design and location of buildings relative to the public realm and adjoining properties;
- Consistency with the character of the locality; and

The historic heritage value of any adjacent heritage item and or feature.

<p>Rule 38.10.8 Lighting and Glare</p> <p>38.10.8.1 No activity on a Nature Conservation Zone, CPZ, CPZ (Golf), CPZ (Camping Ground) and CPZ (Cemeteries) shall result in a greater than 2.5 lux spill (horizontal or vertical) of lights onto any other site measured at any point inside the boundary of the other site (when measured or calculated 2.0m inside the boundary of the adjoining property).</p> <p>38.10.8.2 No activity on an Informal Recreation Zone, Active Sports and Recreation Zone and Civic Spaces Zone shall result in a greater than a 3.0 lux spill (horizontal or vertical) of lights onto any other site measured at any point inside the boundary of the other site (when measured 2.0m inside the boundary of the adjoining property).</p>	<p>Support as notified</p>	<p>Refer to paragraph 4.43 of QAC’s covering submission.</p>	<p>Retain Rule 38.10.8 as notified.</p>
<p>Informal Recreation Zone</p> <p>(Specifically, the “Informal Recreation” zoning over the Lower Shotover Delta, at the end of the Runway End Safety Area).</p>	<p>Oppose</p>	<p>Refer to paragraphs 4.45 to 4.48 of QAC’s covering submission.</p>	<p>Maintain the operative “Rural” land use zoning within the Shotover Delta;</p> <p>OR</p> <p>Create a new “Shotover Delta” Sub Zone and restrict activities within the sub zone to the following:</p> <ul style="list-style-type: none"> ➤ informal recreation (Rule 38.9.2); ➤ public amenities (Rule 38.9.3); ➤ parks maintenance (Rule 38.9.5); ➤ new buildings associated with a permitted activity, not otherwise listed in Table 38.1 (Rule 38.9.24);Recreation Trails (walking, horse and cycling trails) (Rule 38.9.27);

- › Construction of vehicle access and car parking areas, accessory to permitted activities, up to 200m² (Rule 38.9.29);

All other activities should be a non-complying activity, except for ASAN, the parking or placing of any motor vehicle, boat, caravan, trailer or material for the purposes of sale or lease, or mining activities which should all be a prohibited activity.

Entire Chapter / Definitions

Oppose

The proposed new Open Space and Recreation Zone introduces a series of new terms into to the District Plan. In the absence of definitions for these terms, it is difficult to interpret the meaning and intent of the new objectives, policies and methods.

QAC therefore submits that definitions should be provided for each of the following terms and an opportunity to further submit on the definitions (and associated provisions) be provided:

- › Informal recreation;
- › Public amenities;
- › Parks Maintenance;
- › Recreation Facilities;
- › Organised Sport and Recreation; and,
- › Recreational Trails.