

APPENDIX C – Copy of QAC's Further Submission

FORM 6

**FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO,
SUBMISSION ON NOTIFIED PROPOSED POLICY STATEMENT
OR PLAN, CHANGE OR VARIATION**

Clause 8 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
c/- Mitchell Daysh Limited
PO Box 489
Dunedin 9054

1. This is a further submission in opposition to or in support of submission on Stage 2 (and the associated variations to Stage 1) of the Proposed Queenstown Lakes District Plan (Proposed Plan).

2. QAC has an interest in the Proposed Plan that is greater than the interest the general public has within the District.

2.1 As set out in QAC's original submission on the Proposed Plan (Stage 2), QAC owns and operates the regionally and nationally significant Queenstown Airport and manages the regionally significant Wanaka Airport.

2.2 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 passenger movements, or a 13% increase from the previous year. Recent forecasts show no sign of this growth slowing, with passenger movements forecast to reach 5.1 million passenger movements per year by 2045.

- 2.3 Wanaka Airport accommodates aircraft movements associated with general aviation and is a major facilitator of commercial helicopter operations within the District. QAC is currently considering future growth options for Wanaka Airport and what complementary role it could have meeting the passenger demand forecasts for the region.
- 2.4 Queenstown and Wanaka Airports comprise significant infrastructure and assets and play a critical role in providing for the economic and social wellbeing of the Queenstown Lakes District.
- 2.5 In light of the above, QAC considers it has an interest in the Proposed Plan that is greater than the interest the greater public has, by virtue of existing operations within the District.

3. QAC therefore makes the following further submission pursuant to clause 8 of the First Schedule of the RMA. Further submission from QAC on the Proposed Plan are attached to this document in Attachment 1 and form part of this further submission.

4. QAC could not gain an advantage in trade competition through this submission.

5. QAC's further submission is:

- 5.1 In its original submission QAC emphasized the importance of ensuring that the Proposed Plan adequately addresses the following matters:
- That Queenstown and Wanaka Airports are important facilitators of economic growth and wellbeing;
 - That Queenstown and Wanaka Airports are, as far as reasonably practicable, protected from adverse reverse sensitivity effects through the adoption of a land use management framework that is consistent with the New Zealand Standard for airport noise management and land use planning (the NZ Standard or NZS6805);
 - that earthworks are a necessary part of subdivision and development, however such activities need to be undertaken in a manner that avoids adverse effects on aircraft operations;
 - that intensification of land use within the Lower Shotover Delta should be avoided where located within proximity to the Runway End Safety Area (RESA); and,
 - a number of other ancillary amendments to ensure the ongoing effective and efficient operation of the Airports.

- 5.2 QAC seeks to ensure that the key principles identified in its original submission and summarised above are appropriately recognised and provided for in the Proposed Plan.
- 5.3 With respect to reverse sensitivity concerns, QAC has identified a number of reoccurring themes in the submissions as they relate to visitor accommodation. Of particular interest to QAC are broadly framed submissions which seek to:
- 5.3.1 Limit or remove any restrictions be imposed of homestay, visitor accommodation or residential visitor accommodation activities;
 - 5.3.2 Impose a less onerous activity status for homestay, visitor accommodation or residential visitor accommodation activities; or;
 - 5.3.3 Impose a less onerous activity status for homestay, visitor accommodation or residential visitor accommodation activities where the relevant zone standards cannot be achieved.
- 5.4 In many instances, it is not clear the extent to which submitters seek to remove consent requirements and/or adherence to development standards within the Queenstown and/or Wanaka Airport aircraft noise boundaries.
- 5.5 Out of an abundance of caution, QAC has submitted in opposition to these submissions to the extent that they could seek to undermine or alter the land use management framework established for activities sensitive to aircraft noise, as addressed via Stage 1 of the Proposed Plan.
- 5.6 QAC's specific further 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.

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

- 6.1 That the submission points contained in section 5 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
- 6.2 Any consequential changes, amendments or decisions that may be required to give effect to the matters raised in QAC's submission.

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

- 7.1 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 27th day of April 2018

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Annexure A

Submitter	Submission No	Provision	Relief Sought	QAC Position	QAC Reasoning
Chorus	2199.1	Chapter 24 Wakatipu Basin	That the chapter is amended to better align with objectives and policy framework of the Energy and Utilities Chapter.	Support	QAC supports the submitters proposed alignment of the Chapter 24 objective and policy framework with that of Chapters 30.
Spark New Zealand Trading Limited	2195.1				
Vodafone	2478.1				
QLDC	2239.2	Transport	That relevant provisions be amended to clarify that specified land uses in Chapter 29 (for instance, park and ride facilities) are not affected by the rules for non-specified activities located in the zone text.	Oppose	QAC opposes this submission as it appears that it could result in the duplication of zone rules that already provide for such activities. If that is the case, then such an outcome is ineffective and inefficient and should therefore be avoided.
DoC	2242.12	Earthworks	That objective 25.2.1 be modified to read as follows: "Earthworks are undertaken in a manner that <u>avoid adverse effects on outstanding features and landscapes, significant natural areas, wetlands, and the margins of lakes and rivers, and otherwise remedies or minimises adverse effects on the environment to maintain landscape and visual amenity values</u> ".	Oppose	QAC opposes this submission to the extent that it is inconsistent with the higher order policy directives set out in the Proposed Otago Policy Statement.
BDFL	2391.2	Rezoning / Open Space Zone	That Map 30 is amended to rezone the two QLDC Parcels and the Bridesdale parcel situated on the lower Bridesdale lower floodplain to an area Active Recreation Zone.	Oppose	QAC opposes this submission to the extent that the Open Space Zone provisions are inconsistent with the recommendations set out in NZS6805 and may enable the establishment of ASAN within an area where such activities are currently prohibited under the land use management framework established under Plan Change 35 to the Operative Plan.
Queenstown Park Limited	2462.7	Earthworks	That requirements for erosion and sediment control management plans be deleted and only apply to bulk earthworks over 50,000m3.	Oppose	QAC is concerned 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 in the inclusion of the requirement for erosion and sediment control management plans as notified.
	2462.19	Rezoning / Open Space Zone	That Part Section 131 Block III Shotover Survey District be zoned CPZ and have height limits increased to 15m and total ground floor area of buildings increased to 1500m2 for the site.	Oppose	QAC opposes this submission to the extent that the Open Space Zone provisions are inconsistent with the recommendations set out in NZS6805 and may enable the establishment of ASAN within an area where such activities are currently prohibited under the land use management framework established under Plan Change 35.
	Non-specified	Rezoning / Open Space Zone	QPL supports the inclusion of land in the Shotover delta (below and to the north-east of RESA) within the Informal Recreational Zone but also considers given the size of the area some of it if should be zoned Active Sport and Recreation.	Oppose	The proposed rezoning or use of this area for Active Sport and Recreation could potentially encourage the intensification of active sport or recreational activities at the end of the Queenstown Airport RESA. QAC submits that this is inappropriate and poses a potential safety risk (of low probability, but high significance) to zone users in the event of an aircraft under or overshoots at Queenstown Airport.

Real Journeys Ltd	2466.2	Transport	That the Transport Chapter is amended to recognise the benefits of all forms of transport services including land, air and water transport and infrastructure are provided for and not discouraged.	Support	QAC supports this submission as it recognises that air transport form parts of the wider network.
Te Anau Developments Limited	2494.2				
Go Orange Limited	2581.2				
Cadrona Alpine Resort Limited	2492.3				
Remarkables Park Limited	2468.25	Rezoning / Open Space Zone	The submitter seeks amendment to map 30 so rezone Part Section 131 Block III Shotover Survey District Community Purposes Zone and have a maximum building height of 15m and the total ground floor area of the site be increased to 1500m2.	Oppose	QAC opposes this submission to the extent that the Open Space Zone provisions are inconsistent with the recommendations set out in NZS6805 and may enable the establishment of ASAN within an area where such activities are currently prohibited under the land use management framework established under Plan Change 35.
	Non-specified	Rezoning / Open Space Zone	QPL supports the inclusion of land in the Shotover delta (below and to the north-east of RESA) within the Informal Recreational Zone but also considers given the size of the area some of it if should be zoned Active Sport and Recreation.	Oppose	The proposed rezoning or use of this area for Active Sport and Recreation could potentially encourage the intensification of active sport or recreational activities at the end of the Queenstown Airport RESA. QAC submits that this is inappropriate and poses a potential safety risk (of low probability, but high significance) to zone users in the event that an aircraft under or overshoots the runway at Queenstown Airport.
Kiwi Birdlife Park Limited	2569.4	Open Space Zone	That Objective 38.4.1 related policies and any associated District Wide objectives and policies are amended to provide direct support for commercial activities that enhance wildlife and nature conservation values.	Oppose	QAC opposes this submission to the extent that such activities should not be undertaken within the take off and approach paths at Queenstown Airport and Wanaka Airports where they may result in an increased presence of birdlife.
Shaping our Future	2511.4	Transport	That the general framework is amended so that it promotes integrated strategic planning between current and future transport needs, improves commuter trails and promotes an innovative approach to transport.	Support	QAC supports initiatives that encourage integrated strategic planning around transportation needs and seeks to be involved in the development of a framework that achieves this outcome.
Darryll Rogers	2003.1	Visitor Accommodation - Variation	That no limits or resource consent requirements be applied to visitor accommodation activities, homestays and/or residential visitor accommodation activities.	Oppose	QAC opposes these submissions to the extent that they may result in the removal of provisions relating to activities sensitive to aircraft noise, as addressed during Stage 1 of Proposed Plan review.
Shane Melton	2006.1				
Gabriella Napper	2005.1				
Tony Preen	2023.2				
Skyview Magic Limited	2032.3				
AirBnB	2390.6-2390.7				
BSTGT Limited	2487.16-17				
Adrian Collier	2010.1				
Kim Netzler	2083.2				
Noel Coutts	2113.4				
Oanita Collins	2114.4				
Cornelia Bryant	2116.3				

Danelle Jones	2117.4
Virginia Brown	2119.4
Anne Percy	2179.4
Colleen Morton	2180.4
Kristy Topp	2570.4
Maurice Joseph Murphy	2583.4
Kate Craigbrown	2588.4
William Jin	2481.5
Mark Arbuckle	2085.1, 4
Williams, Noel	2063.1

Spectrum Property Group Ltd	2090.1 2090.2	Visitor Accommodation - Variation	That the proposed visitor accommodation variation is amended to provide allowances for short term luxury accommodation.	Oppose	QAC opposes this submission to the extent that it is inconsistent with the recommendations set out in NZS6805.
Topp, Kristy Juergensen, Heather Craigbrown, Kate Murphy, Maurice Joseph	2570.5 2573.1 2588.5 2583.5	Visitor Accommodation – Variation	That the non-complying activity status for residential visitor accommodation and homestays that fail to comply with permitted activity standards is rejected.	Oppose	QAC opposes these submissions to the extent that any residential visitor accommodation and homestay activity should be required to comply with the acoustic treatment and density requirements of the underlying zone, where these are impacted by the aircraft noise boundaries and Queenstown and Wanaka Airports.
Marsden, Philip David	2432.3	VA - Chapter 2: Definitions	Opposes the definition of Residential VA. Seeks that a definition of 'Holiday Home' is included and that this activity is treated separately in the rule framework.	Oppose	If a new definition is included in the Proposed Plan as per the submitters requested relief, the definition of Activity Sensitive to Aircraft Noise would need to be amended accordingly.