

Before the Queenstown Lakes District Council

In the Matter of the Resource Management Act 1991

And

In the Matter of the Queenstown Lakes Proposed District Plan Hearing

Stage 3 (Stream 17 – Chapter 18A General Industrial Zone;
Business Mixed Use Zone Design Guidelines; Stream 18 -
Variations to Chapter 30 Energy and Utilities; Variation to Chapters
7, 8, 9 and 15 Glare)

STATEMENT OF EVIDENCE BY MELISSA BROOK

(SUBMITTER 3316 AND 31010)

29 May 2020

1. INTRODUCTION

- 1.1 My name is Melissa Brook. I am the Senior Planner at Queenstown Airport Corporation (QAC). I have been employed at QAC in this role since November 2019. QAC has authorised that I give this corporate evidence on its behalf.

Scope of Evidence

- 1.2 QAC filed a number of submissions and further submissions in respect of Stage 3, including 3B of the Proposed District Plan (PDP). This included a number of submissions that directly or indirectly relate to operational matters at Queenstown and Wanaka Airports.
- 1.3 In this statement of evidence I address operational matters within:
- 1.3.1 Chapter 18A General Industrial Zone
 - 1.3.2 Variations to Chapters 7, 8, 9 and 15 Glare
 - 1.3.3 Variations to Chapter 30 Energy and Utilities
 - 1.3.4 Business Mixed Use Zone Design Guidelines

2. GENERAL INDUSTRIAL ZONE

- 2.1 The General Industrial Zone is the only Stage 3 land use zone located within aircraft noise boundaries at Queenstown Airport. QAC seeks to ensure that land use activities provided for within the zone are of a nature, scale and intensity that is compatible with the adjacent Airport.

Height limits

- 2.2 QAC submits that the section 32 evaluation does not contain an assessment of the effects of increasing the permitted building height limit from 6m to 10m or any evaluation of the costs or benefits to aircraft operations from making this change. In the absence of this information, QAC opposed the proposed 10m height limit and submits that the operative 6m height limit should be retained.
- 2.3 The section 42A report expresses the view that the effect of the 'Approach and Land Use Control' designation for Queenstown Airport is sufficient to appropriately control building height in the relevant areas. QAC agrees that the designations should be sufficient to control the extension of buildings and structures into these surfaces, but experience dictates that the statutory obligations to obtain QAC's approval under section 176 of the Act is often overlooked when considering applications for resource consent. On several occasions QAC has been required to contact an applicant, and the Council, regarding the applicant's obligations under the designation to ensure that they were met.
- 2.4 The section 42A report recommends rejecting QAC's relief which sought to include an interpretation note to the section drawing attention to the designation, observing that the section 176 requirement applies to all designations across all zones. Although QAC agrees that the section 176 obligation remains in place with or without the advice note, QAC recognises the obstacle limitation surface is quite different from most designations as it applies more widely to the airspace over privately owned properties and is often missed not only by applicants but also by processing officers.

QAC therefore submits that it would be prudent to include a new advice note into the General Industrial Zone chapter which draws plan users' attention to the requirements inherent in the designation.

Land Use Activities

- 2.5 QAC supports the section 42A report's assessment that the zone is not suitable for residential accommodation.
- 2.6 QAC has a reasonable understanding of the bird species that frequent the surrounds of Queenstown Airport and their flight characteristics (i.e. the time of day/year they are present and their preferred flight tracks.) This knowledge allows us to proactively manage bird strike risk through the implementation of a number of bird control measures. Changes in the surrounding environment, for example the establishment of a refuse station, can change the characteristics of the bird habitat. This can result in an increase in presence of birds as well as the introduction of new species. QAC submits that although there have not been any specific issues resulting from wildlife attracted to the existing refuse centre in Glenda Drive, refuse facilities have the potential to increase birdlife if not managed correctly. QAC submits that non-complying status for such activities should be ensured.
- 2.7 Although the section 42A report considers that refuse collection and disposal site activities would have non-complying status under the rule framework, QAC submits that removal of "refuse collection and disposal" from Rule 18A.4.10 has an unintended consequence of potential confusion as to the activity status of "refuse collection and disposal". As the most suitable activity definition 'Any activity requiring an Offensive Trade Licence under the Health Act 1956' then specifically excludes "refuse collection and disposal", plan users would look to identify a different activity type that it would capture it. The activity could arguably be captured by the definition of 'outdoor storage', which as defined in Chapter 2 "means land used for the purpose of storing vehicles, equipment, machinery, natural and processed products and wastes, outside a fully enclosed building for periods in excess of 4 weeks in any one year", resulting in permitted activity status.
- 2.8 QAC supports the intent of the s42A report that "refuse collection and disposal" have a non-complying activity status in the General Industrial Zone. The non-complying status of the activity will be ensured by removing the "refuse collection and disposal" exception from Rule 18A.4.10. This will also ensure clarity and consistency in the planning framework and prevent confusion to future plan-users.

Lighting and Glare

- 2.9 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. This includes lighting that may mimic airfield lighting.
- 2.10 Resource consent (RM190264) was granted for a hotel in July 2019 that has resulted in substantial correspondence between the applicant and QAC following consent being granted. The lighting of the hotel was proposed to be green, the hue very similar to that used for airfield lighting. The location of the proposed hotel means that on final approach a pilot could be looking directly at the lighting. The potential adverse effects on the safety and operation of the airport were not considered through the resource consent process. This is the situation that QAC wishes to

address in the Proposed District Plan through the addition of standards avoiding the potential mimicking of airfield lights.

- 2.11 Inappropriately managed lighting of any description within proximity to the Airport is of concern. As an example, bright glaring lights were an issue when the sport field lights were first constructed and required substantial direction to change the operating parameters of the lights from QAC before they were deemed safe.
- 2.12 QAC submits that the addition of a new matter of discretion is required within Rule 18.5.7 ensuring the effects of the breach on aircraft operations can be considered. QAC further submits that a new standard should be introduced with respect to the General Industrial zone that avoids the potential mimicking of airfield lights.

3. VARIATION – GLARE

- 3.1 Paragraphs 2.9 – 2.12 above outline the potential adverse effects that can occur on the safety of aircraft operations due to inappropriately managed lighting in proximity to airports.
- 3.2 QAC submits that as the distance between the proposed activity and the airport widens the risk of inappropriate lighting affecting safe aircraft operations reduces. The potential consequence of inappropriate lighting affecting safe aircraft operations remains high.
- 3.3 QAC submits that the appropriate method to mitigate this risk is the introduction of a new matter of discretion which ensure that when lighting and glare standards included in the surrounding zones are breached the effects of a breach on aircraft operations can be considered.
- 3.4 QAC submits that if an area were to be defined within which this matter of discretion would apply, the appropriate area would be the Inner Horizontal Surface as defined in Figure 2 (Queenstown Airport: Airport Protection and Inner Horizontal and Conical Surfaces) as it relates to Chapters 7, 8, 9 and 15. This area would ensure that any application for a breach of lighting that could potentially enter the field of vision of pilots or flight crew on approach or departure could be adequately assessed.

4. VARIATION – ENERGY AND UTILITIES

Airport Related Activities

- 4.1 QAC submits that as notified, Rule 30.3.3.5 does not address the potential duplication of controls relating to Airport Related Activities, which form part of the wider ambit of the airport network utility operation and are therefore also utilities, by definition.
- 4.2 QAC agrees with the section 42A report that in principle Airport Related Activities should not engage with Chapter 30. QAC considers that the mechanism to achieve this outcome is by amending Rule 30.3.3.5 to clarify that both Airport and Airport Related Activities are managed by Chapter 17.
- 4.3 Activities anticipated as an 'airport' by the Airport Authorities Act 1966 include activities that are defined as 'Airport Related Activities' under the Proposed District

Plan. By not excluding Airport Related Activities from Chapter 30, arguably Chapter 30 could be relevant to some of these Airport Related Activities. QAC considers that this is contrary to the intention of the Proposed District Plan. QAC submits that this is not an efficient nor effective means of achieving the purpose of the Act.

Open Water Bodies

- 4.4 QAC submits that the Proposed District Plan must include appropriate provisions to ensure the establishment of open water bodies, water courses and channels are appropriately managed to avoid giving rise to adverse effects that could result in a potential safety risk to airport operations.
- 4.5 QAC considers that a restricted discretionary activity status for the establishment of water and irrigation races, drains, channels, stormwater detention/retention ponds or stormwater wetlands, is an appropriate method to enable the assessment of bird strike effects on airport operations within proximity of the Queenstown and Wanaka airports.
- 4.6 QAC submits that an appropriate area within which a restricted discretionary activity status should apply is the area identified within the Inner Horizontal Surface as defined in Figures 2 (Queenstown Airport: Airport Protection Inner Horizontal and Conical Surfaces) and 4 (Wanaka Airport: Airport Protection Inner Horizontal and Conical Surfaces).

5. BUSINESS MIXED USE ZONE DESIGN GUIDELINES

- 5.1 QAC confirms that the proposed replacement tree species *Quercus palustris* (Pin Oak) and *Podocarpus cunninghamii* (Mountain Totara) have previously been identified as an appropriate species within proximity to the Airport.
- 5.2 QAC submits that the list of approved species for the Airport Zone (attached) may be an efficient method to address suitability of species.

Melissa Brook

29 May 2020

QAC SPECIES LIST

Botanic Name	Common Name
Trees (Native)	
<i>Griselinia littoralis</i>	papauma/ broadleaf
<i>Olearia paniculata</i>	golden akeake
<i>Pittosporum eugenioides</i>	tarata/lemonwood
<i>Pittosporum tenuifolium</i>	kohuhu
<i>Pittosporum tenuifolium</i> 'silversheen'	Pittosporum cultivar
<i>Plagianthus regius</i>	manatu/ribbonwood
<i>Pseudopanax crassifolius</i>	lancewood
<i>Pseudopanax ferox</i>	Fierce lancewood
<i>Podocarpus laetus</i>	Mountain totara
<i>Sophora microphylla</i> *	South Island kowhai
Trees (Exotic)	
<i>Ulmus sp.</i> , elm	Low
<i>Ulmus parvifolia</i>	Chinese Lacbark Elm
<i>Ulmus procera</i> 'Louis van Houtte'	Golden Elm
<i>Ulmus parvifolia</i> 'Frontier'	Chinese Lacbark Elm
<i>Ulmus carpinifolia</i> 'Variegata'	Smooth Variegated Elm
<i>Ulmus glabra</i> 'horizontalis'	Weeping Wych
<i>Fagus sylvatica</i>	European beech
<i>Quercus palustris</i>	Pin oak
Shrubs (Native)	
<i>Hebe sp.</i>	
<i>Coprosma crassifolia</i>	
<i>Coprosma propinqua</i>	mingimini
<i>Coprosma rugosa</i>	
<i>Corokia cotoneaster</i>	Korokio
<i>Muehlenbeckia astonii</i>	Shrubby tororaro
<i>Pachystegia insignis</i>	Marlborough rock daisy
<i>Pittosporum 'golfball'</i>	Dwarf Pittosporum
<i>Olearia lineata</i>	
<i>Sophora prostrata</i>	prostrate kowhai
<i>Veronica albicans</i>	hebe
<i>Veronica 'emerald green'</i>	
<i>Veronica [Hebe] evenosa</i>	Tararua hebe
Shrubs (Exotic)	
<i>Azalea sp.</i> *	Rhododendron
<i>Camellia sp.</i> *	
<i>Escallonia sp.</i>	least
<i>Photinia sp.</i>	least
<i>Pieris sp.</i>	unknown
<i>Rhododendron sp</i> *	least
<i>Viburnum sp</i>	least
<i>Cornus alba</i> 'Sibirica'	Red-barked dogwood

Ground Covers, Grasses and Herbs (Natives)	
<i>Acaena novae-zelandiae</i>	Red bidibid
<i>Aciphylla subflabellata</i>	taramea/fine speargrass
<i>Anemanthele lessoniana</i>	wind grass, gossamer grass
<i>Astelia sp.</i>	nz bush lily
<i>Austroblechnum penna-marina</i>	Little hard fern
<i>Carex testacea</i>	Speckled sedge/ trip me up
<i>Carex uncinata</i>	Hook grass
<i>Chionochloa flavicans</i>	Dwarf toetoe
<i>Chionochloa rubra</i>	red tussock
<i>Coprosma acerosa 'red rocks'</i>	Prostrate coprosma
<i>Libertia ixiodes</i>	native NZ iris
<i>Libertia peregrinans</i>	NZ Iris
<i>Libertia 'Taupo blaze'</i>	Libertia
<i>Muehlenbeckia axillaris</i>	mat pohuehue
<i>Phormium cookianum*</i>	Mountain flax
<i>Poa cita</i>	silver tussock/wiwi
<i>Poa colensoi</i>	blue tussock
<i>Scleranthus uniflorus</i>	
Ground covers and Grasses (Exotic)	
<i>Ajuga reptans</i>	Carpet bugle
<i>Bergenia cordifolia</i>	Heartleaf bergenia
<i>Grevillea sp.</i>	
<i>Lavendula sp.</i>	Lavender
<i>Nandina domestica 'Firepower'</i>	Nandina
Climbers (Native)	
<i>Clematis paniculata</i>	puawananga/White clematis
<i>Parsonia capsularis</i>	native jasmine

*(not to be mass planted)