BEFORE THE HEARINGS PANEL APPOINTED BY THE QUEENSTOWN LAKES DISTRICT COUNCIL

Under	the Resource Management Act 1991 (**RMA**)
In the matter	of the Urban Intensification Variation to the Proposed Queenstown Lakes District Plan
Submitter	**QUEENSTOWN AIRPORT CORPORATION LIMITED** Submitter 822 and Further Submitter 1355

Evidence of **Samantha Leeanne Kealey** on behalf of Queenstown Airport Corporation

Dated: 07 July 2025

Counsel Acting | Rebecca Wolt
Email | rebecca@rebeccawolt.co.nz
Phone | 021 244 2950

INTRODUCTION

1. My name is Samantha Leeanne Kealey. I am a Principal Planner at Town Planning Group (NZ) Limited, a resource management and planning consultancy that provides planning and resource development advice to private clients, local authorities and government agencies New Zealand-wide.

2. I have 10 years' experience as a practicing planner in New Zealand. My experience includes a mix of local authority, unitary authority and consultancy resource management work with a focus on statutory planning, environment assessment, policy development and analysis, and consenting. I hold a degree in Planning from the University of Auckland obtained in 2014.

3. Some examples of relevant project experience include but are not limited to:

    a. Gibbston Valley Resort, through consenting and implementation of land use and subdivision developments;
    b. Silver Creek subdivision on Queenstown Hill, through consenting and implementation of an urban subdivision that is under development that will provide for over 500 households;
    c. Plan Change 14 to the Operative Christchurch District Plan to reintroduce the accommodation and community facilities overlay whilst retaining the High Density Residential Zone;
    d. Waimakariri Proposed District Plan to rezone 25ha of rural land to large lot residential land; and
    e. Victoria Flats, an industrial subdivision in the Gibbston Character zone and rural zone to allow for industrial uses, rural tourism activities and storage facilities
    f. Assisting on various zoning appeals on the Proposed Queenstown Lakes District Plan (**PDP**).

4. I have a working knowledge of the Queenstown Lakes District Plan.

5. I am very familiar with the area and surrounds having made numerous visits to Queenstown Airport and the area surrounding the Airport prior to, and during the preparation of this evidence.

CODE OF CONDUCT

6. While this is not an Environment Court hearing, I confirm that I have read of the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023, Section 9 – Code of Conduct for Expert Witnesses and have complied with it when preparing this evidence. I confirm that this evidence is within my area of expertise, other than where I state that I am relying on another person, and that I have not omitted to consider any material facts known to me that might alter or detract from the opinions I express.

SCOPE OF EVIDENCE

7. The purpose of my evidence is to assist the Hearing Panel on matters within my expertise in planning in relation to a submission and further submissions made by the Queenstown Airport Corporation (**QAC**) on the Urban Intensification Variation (**Variation**) to the PDP.

8. In my evidence I will cover the following:

    a. An overview of the Queenstown Airport including an overview of the airport in a planning context;

    b. The Urban Intensification Variation as proposed by Queenstown Lakes District Council and how it is applicable and relative to the airport;

    c. Section 32 of the RMA, including an evaluation of reasonably practicable options and alternatives for achieving the objectives, the efficiency and effectiveness of the options, the costs and benefits of the options, and whether the objectives of the Urban Intensification Variation are the most appropriate way to achieve the purpose of the RMA;

    d. The Queenstown Airport Corporation Submission of the variation;

    e. the statutory framework for the formulation of district plans, including in particular the requirement under section 75(3)(a) to give effect to the National Policy Statement for Urban Development 2022 (NPS-UD);

    f. The Queenstown Airport submission as it relates to the policy context;

g. Other submissions and further submissions.

DOCUMENTS REVIEWED

9. In preparing this evidence, I have read the following documents:

a. The reports and evidence prepared for the Council in support of the Variation, including:[1]

i. The S32 Report Urban Intensification Variation – NPS-UD Policy 5 Variation and the following relevant appendices:

1. Appendix 1 AA – Summary of changes to the PDP provisions
2. Appendix 1AB - Proposed amendments to PDP maps
3. Appendix 1B-1L Proposed Provisions
4. Appendix 7 – Economic memo on Intensification within the Queenstown Airport OCB
5. Appendix 8 – Option 3 for Intensification within the Queenstown Airport OCB

b. The Council's section 42A reports and evidence, including:

i. UIV Section 42A Report (Strategic Evidence) – Amy Bowbyes – 6.6.2025

1. Strategic Evidence Appendix 1 – Part 1 of 2 – s42A Recommended Provisions
2. Strategic Evidence Appendix 2 – Part 2 of 2 – s42A Recommended Provisions
3. Strategic Evidence Appendix 2 – Summary of submissions and recommended decisions

ii. UIV Section 42A Report (Ch2, 4, 7) – Amy Bowbyes – 6.6.2025

iii. UIV Section 42A Report (Town Centres and Business Zones) – Corinne Fischknecht – 6.6.2025

[1] Reports contained at https://www.qldc.govt.nz/your-council/district-plan/urban-intensification-variation/ and evidence of Ms A Bowbyes, Ms C Frischknecht, Mr E Matthee, Ms S Fairgray, and Mr C Wallace.

iv. UIV Section 42A Report (Rezoning Business and Hawea) – Corinne Fischknecht – 6.6.2025

v. UIV Section 42A Report (Subdivision) – EJ Matthee – 6.6.2025

vi. UIV Statement of Evidence (Economics) – Susan Fairgray – 6.6.2025

vii. UIV Statement of Evidence (Urban Design) – Cam Wallace – 6.6.2025

c. The submission and further submission of QAC

d. The submissions and further submissions of the following parties:

i. Submission 1238 – NZ Infrastructure Commission

ii. Submission 200 – Waka Kotahi

iii. Submission 800 – Ministry of Housing and Urban Development

iv. Submission 548 – Wood

v. Submission 766 – No. 1 Hansen Road Limited

vi. Submission 775 – City Impact Church

vii. Submission 768 – Latitude 45 Development Limited

viii. Submission 380 – Hansen Family Trust

ix. Submission 44 – Smith

x. Submission 632 – Oates

xi. Submission 191 – Queenstown Central

xii. Submission 473 – Grant/Perpetual Trust

xiii. Further Submission 1330 – City Impact Church

xiv. Further Submission 1331 – No. 1 Hansen Road Limited

xv. Further Submission 1332 – Latitude 45 Development Limited

e. The following statutory planning documents:

i. National Policy Statement on Urban Development 2020 (**NPS-UD**)

ii. Proposed provisions – New National Policy Statement for Infrastructure 2025 (NPS-I)

iii. Otago Regional Policy Statement 2019 (**ORPS**)

iv. Proposed Otago Regional Policy Statement 2021 (**PORPS**)

v. Queenstown Lakes Proposed District Plan (**PDP**)

f. NZS 6805:1992 - The New Zealand Standard for airport noise management and land use planning (**NSZ:6805 or Standard**)

10. I have also read, in draft, the evidence for QAC prepared by Melissa Brook and the acoustic evidence of Mr Chris Day. Where relevant, I draw from and rely on this evidence in my own evidence.

EXECUTIVE SUMMARY

11. The primary issues arising from the Variation as it relates to Queenstown Airport are potential adverse health and amenity effects for the community, and potential reverse sensitivity effects for Queenstown Airport. These issues arise from submissions on the Variation that seek to enable or intensify activities sensitive to aircraft noise (**ASAN**) in close proximity to the Airport, within the Airport's noise boundaries. Additionally, safety issues may arise if obstacles associated with built form are allowed to encroach into the airspace around Queenstown Airport.

12. Legislatively, Queenstown Airport is nationally and regionally significant infrastructure, as recognised in the NPS-UD, ORPS, PORPS and PDP.

13. In terms of the PDP, the strategic chapters outline that Queenstown Airport makes an important contribution to the prosperity and resilience of the District,[2] and that as regionally significant infrastructure, it is to be protected[3]. These strategic objectives

[2] Policy 3.3.6 of the Proposed Queenstown Lakes District Plan
[3] Policy 3.3.24B of the Proposed Queenstown Lakes District Plan

and policies give effect to the higher order strategic planning documents. They are implemented through the zoning and district wide chapters of the PDP that limit the establishment of new ASAN in proximity to Queenstown Airport.

14. Queenstown Airport serves as a vital gateway for domestic and international tourism. It contributes substantially to the regional economy and plays a strategic role in emergency response including search and rescue operations, medical evacuations, and disaster response capabilities as well as freight logistics ensuring the efficient movement of high-value and time-sensitive goods, which is particularly important for local businesses and the wider Otago region. Queenstown relies heavily on the accessibility and connectivity provided by the Airport to sustain its economy. Queenstown Airport is more than just a transportation hub — it is an essential asset for the social, economic, and operational wellbeing of the district and region.

15. The interface of the Airport and surrounding urban environment is managed in the PDP by the imposition of aircraft noise boundaries, based on predicted future aircraft noise. The Air Noise Boundary (**ANB**) is where future noise from aircraft will exceed 65dB $L_{dn.}$ NZS6805 recommends that residential and other sensitive activities are be prohibited within this area due to likelihood of adverse effects on health and amenity arsing for the community, and reverse effects arising for the Airport. The Outer Control Boundary (**OCB**) represents where future noise from aircraft will exceed 55 dB L_{dn}, and where aircraft noise could still have adverse effects on health and amenity and give rise to reverse sensitivity effects. Consequently, new residential or other sensitive activities are also recommended to be prohibited in this area, where possible.

16. Related to the Queenstown Airport noise boundaries is a land use planning regime that is contained in the PDP which limits the establishment of new ASAN in the ANB and OCB so as to limit the number of people exposed to aircraft noise and thus limit potential adverse amenity and health effects for the community, and to minimise reverse sensitivity risk for Queenstown Airport.

17. The PDP regime came about through an extensive and detailed process that was endorsed by the Environment Court and generally accords with NZS6805. It gives effect to the PDP policy framework for the Airport, and those of the higher order statutory planning documents, and in my opinion represents the most appropriate

method to recognize and protect the Queenstown Airport and provide for community health and wellbeing. It also ensures an urban environment that functions well and enables all people and communities to provide for (amongst other things) their social and economic wellbeing, and their health and safety - now and into the future and in this regard gives effect to the NPS-UD.

18. I consider that any changes to the current regime that would enable additional ASAN to establish within areas affected by aircraft noise carries with it a substantial risk to the Airport and the community, and would fail to give effect to the very clear policy direction in the applicable statutory planning documents that in essence seeks to avoid such risk and protect the significant Airport infrastructure.

19. Allowing incompatible land uses with the Airport's noise boundaries could undermine the strategic Airport asset by exposing more people to adverse noise effects and increasing the potential for litigation or planning challenges that seek to curtail or limit airport activities. Such outcomes not only jeopardise the airport's long-term operational certainty but also diminish its ability to meet projected passenger growth and transport services, with detrimental flow on effects for the community's economic and social wellbeing.

20. The Airport's ability to undertake infrastructure upgrades and adapt to future aviation needs is strongly linked to the certainty provided by the existing land use regime that applies under the PDP. Enabling new or additional ASAN development within the noise boundaries in a manner that is inconsistent with the airport's operational envelope could lead to reactive and costly mitigation measures in the future, such as retrofitting buildings for acoustic insulation or purchasing affected properties. These measures are often inefficient and do not fully resolve the fundamental issue of land use incompatibility.

21. In summary, rezoning or enabling additional or new sensitive activities within the Airport's noise boundaries could result in land use conflicts that erode the integrity of planning frameworks designed to safeguard the Airport, and potentially threaten the long-term sustainability of one of New Zealand's most important regional airports.

22. In my view it is essential that land within the noise boundaries remains protected from new development that is not aligned with the operational realities of a busy and

growing airport. The notified Variation largely achieves this. However, given the uncertainty around the degree to which the Variation may enable additional ASAN within the noise boundaries, I consider that to give better effect to the established policy framework for the Airport it is appropriate, to retain the existing PDP methods that apply to land within the Airport's noise boundaries (or their equivalent).

QUEENSTOWN AIRPORT – OVERVIEW

23. QAC operates the regionally and nationally significant Queenstown Airport. Ms Brook has provided some context about QAC and the role of Queenstown Airport in facilitating the transportation of people and goods, and the Airport's economic contribution to the region. I briefly summarise this below but otherwise rely on her evidence on these matters.

24. It is evident that Queenstown Airport plays a major role in the economy, both currently and looking ahead. As outlined in Ms Brooks' evidence, the airport serves as the primary entry point for visitors to the Queenstown Lakes District, and more generally, a key entry point to the wider region. It is the gateway to the lower South Island for visitors, providing easy access to some of New Zealand's most iconic destinations, including Queenstown, Wānaka, Fiordland and Central Otago. It is also the home base for a range of helicopter and fixed-wing operators offering scenic flights and other tourism activities.

25. In recent years, there has been notable growth in passenger volumes, particularly among international travellers. As explained by Ms Brook, over the previous 12-month period, Queenstown Airport accommodated in excess of 2.48 million passengers. Recent growth projections have indicated that passenger growth is set to continue, with 3.2 million passengers projected per annum by 2032.

26. Queenstown holds national significance as a tourist hotspot, and tourism remains a vital contributor to the New Zealand economy overall. Based on Infometrics NZ, the tourism sector contributes to 4.1% of the total NZ economy.[4] . The tourism sector contributed $1,411.2M towards GDP in Queenstown-Lakes District in 2024. This amounted to 30.4% of Queenstown-Lakes District's economic output in 2024. Growth

[4] https://rep.infometrics.co.nz/queenstown-lakes-district/tourism/gdp

in the tourism sector in Queenstown-Lakes District has averaged 5.6% since 2000, compared with an average of 2.6% in New Zealand.[5]

27. In December 2023, Queenstown's tourism-related expenditure reached $90 million, marking a 4% increase from December 2022 and a 7% rise from 2019. International visitor spending accounted for $53M, 21% up on December 2022 and equal to December 2019.

28. Based on the Ministry of Business, Innovation and Employment tourism forecasts and passenger number growth rates, total tourism spending is projected to increase by between 3.4 per cent and 3.9 per cent per annum[6]. A 2014 economic assessment[7] indicated this is expected to take the total tourism spending facilitated by Queenstown Airport to between $1.1bn and $1.4bn by 2037. However, this amount will likely now be significantly greater, given the Airport's most recent growth predictions.

29. As well as being a major facilitator of tourism, Queenstown Airport enables essential connectivity for residents and businesses, through providing convenient access to regular domestic flights and services.

30. Queenstown Airport Corporation itself employs approximately 85 staff on-site, working across airport operations, management, security, commercial oversight and more. Additionally, approximately 60 businesses and agencies operate within the airport campus, collectively employing more than 700 people, operating across the airport precinct.

31. It is clear from the above that the Queenstown Airport comprises significant infrastructure and makes a significant contribution to the social and economic wellbeing of the local and wider community.

32. The on-going ability of Queenstown Airport to function and grow without undue constraint is therefore of significant importance to the tourism industry, at district level, and also regionally and nationally. And, because the tourism industry is such a significant contributor to the District's economy, the ongoing operation and

[5] https://rep.infometrics.co.nz/queenstown-lakes-district/tourism/gdp
[6] https://www.mbie.govt.nz/immigration-and-tourism/tourism-research-and-data/international-tourism-forecasts/2019-2025-international-tourism-forecasts?utm_
[7] Market Economics Limited "Queenstown Airport Mixed Use Zone, Economic Assessment" November 2014.

development of the Airport is also of significant importance to the social and economic wellbeing of the community.

QUEENSTOWN AIRPORT- PLANNING CONTEXT

33. 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**).

34. QAC is also a lifeline utility under the Civil Defence Emergency Management Act 2002 (**CDEM**). QAC has duties under that Act which are aimed at ensuring the wellbeing of people and the community is maintained during and after an emergency.

35. At a strategic policy level, Queenstown Airport is recognised as significant infrastructure. The Airport is recognised as Nationally Significant Infrastructure (**NSI**) under the National Policy Statement for Urban Development (**NPS-UD**) and Regionally Significant Infrastructure (**RSI**) under both the Otago Regional Policy Statement 2019 (**ORPS**) and the Proposed Otago Regional Policy Statement 2021 (**PORPS**), where it is also NSI. It is also recognised as RSI in the Queenstown Lakes Proposed District Plan (**PDP**).

36. Queenstown Airport is the subject of two designations in the PDP, namely:

    a. 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. QAC's operating hours under this designation are 6am – 10pm.

    b. Designation 4 – The Approach and Land Use Controls (transitional slopes and surfaces): The purpose of this designation is to provide obstacle limitation surfaces around the Airport to ensure safe operation of aircraft approaching and departing the Airport (in essence, an airspace designation). No object or extension of an object may penetrate the airspace designation without QAC's authorisation.

37. The PDP contains objectives, policies and rules that recognise the significance of Queenstown Airport and seek to protect it from encroaching incompatible noise sensitive activities which have the potential to experience adverse amenity and health effects and give rise to reverse sensitivity effects on the Airport. I address the PDP regime in more detail later in my evidence.

URBAN INTENSIFICATION VARIATION

38. Policy 5 of the NPS-UD requires territorial authorities to enable development in particular urban environments, including areas with many employment opportunities, that are well serviced by public transport or where there is high demand for housing or for business land in the area, relative to other areas within the urban environment.

39. The Urban Intensification Variation is intended to directly implement Policy 5 of the NPS-UD by promoting a more efficient use of urban land, and to implement the wider objectives of the NPS-UD. It does this by providing for intensification in established areas, and upzoning land in some areas. The areas of significance to QAC that are also subject to the variation are the Frankton and Frankton North areas. These are of relevance as part of the land falls within the OCB and ANB for Queenstown Airport or is under the Obstacle Limitation Surfaces (**OLS**) for Queenstown Airport.

40. The NPS-UD acknowledges that not all urban areas are suitable for intensification due to there being specific features that need to be protected or characteristics and constraints that need to be taken into account. More specifically, clause 3.32 of the NPS-UD, identifies "qualifying matters". Where a qualifying matter exists, a council may adjust the default intensification rules (such as building heights and densities), if a specific matter makes higher density inappropriate.

41. Qualifying matters include: "*(c) any matter required for the purpose of ensuring the safe or efficient operation of nationally significant infrastructure*."[8] The NPS-UD defines "nationally significant infrastructure" to include *"...any airport (but not its ancillary commercial activities) used for regular air transport services by aeroplanes capable of carrying more than 30 passengers."* This definition encompasses Queenstown Airport, confirming its status as nationally significant infrastructure.

[8] NPS-UD, cl 3.32

42. Qualifying matters apply specifically to Tier 1 authorities, and they therefore do not directly apply to the Queenstown Lakes District, being a Tier 2 local authority. However, the Council's reporting on the Variation acknowledges that there are possible constraints to the enablement of development that need to be taken account of when assessing areas suitable for rezoning or provision changes, and is this regard, has 'taken guidance' from the NPS-UD provisions on qualifying matters for Tier 1 authorities[9]. The Council's reporting identifies the ANB and OCB for Queenstown Airport as a possible constraint to intensification, and the Variation, as notified, does not provide for intensification within the noise boundaries (although it does provide for height increases in some zones).

43. Detailed reasons for this approach are given by Ms Bowbyes in her s42A report on strategic matters, as follows:

"Identified Exclusions and Partial Exclusions to Intensification

The s32 Report outlines the approach taken for locations where the level of development directed by Policy 5 of the NPS-UD is not suitable due to location specific matters that are a development constraint. In identifying these exclusions, the s32 Report used the NPS-UD criteria for Qualifying Matters for Tier 1 authorities as a guide.

In summary, the exclusions outlined in the s32 Report are the following:

(d) Land within the Queenstown Airport Air Noise Boundary (ANB) and Outer Control Boundary (OCB) identified on PDP planning maps (for the purpose of ensuring the efficient operation of nationally significant infrastructure). As outlined in the s32 Report, a partial exclusion was applied to this land, whereby changes to zone provisions were applied to the existing zones located within the ANB and OCB, however no changes were notified to planning maps on land within the ANB and OCB.

While these constraints are largely informed by the NPS-UD criteria for Qualifying Matters for Tier 1 authorities they also in effect address policy conflicts between the NPS-UD's directive to intensify and PDP's strategic direction for the management of growth, land use and development in a manner that ensures sustainable management of the QLD's special qualities. This then in effect ensures continued alignment with the

[9] S32 Evaluation report, Section 6.2 page 36

PDP Strategic Directions (PDP Chapter 3), and contributes to achieving a well-functioning urban environment (Policy 1 of the NPSUD)."

44. Hence, the reasons for not applying the Urban Intensification Variation density and height increases within ANB and OCB are founded in the NPS-UD with Council identifying the noise boundaries as a Qualifying Matter, and also the PDP.

45. Whilst it is unclear from the NPS-UD whether Qualifying Matters may be taken account of by a Tier 2 local authority, I am of the opinion that the notified approach is necessary to give effect to Objective 1 and Policy 1 of the NPS-UD. Objective 1 seeks that:

"New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future."

46. Objective 1 requires that well-functioning urban environments enable all people and communities to provide for (amongst other things) their social and economic wellbeing, and their health and safety - now and into the future.

47. In my view, a well-functioning urban environment necessarily includes the provision of nationally significant infrastructure (**NSI**).

48. Ms Brook's evidence establishes the social and economic significance of the Airport to the district's community, which I have summarised and elaborated on earlier. Mr Day's evidence identifies that the enablement of additional ASAN within the Airport's noise boundaries, through intensification or rezoning, can give rise to effects and constraints on the efficient and effective operation of airport infrastructure, and lead to constraints on or curtailment of lawful and planned future activities. Given the significance of the Airport to the District's economic and social wellbeing, there is at least a potential, if not an evitability, that curtailment or constraint of Queenstown Airport activities will have adverse flow on economic and social effects. Im my view, this would not equate with 'enabling all people and all communities to provide for their social and economic wellbeing', as required by Objective 1.

49. Mr Day has also detailed that exposure to the aircraft noise levels permitted within the OCB can give rise to health effects, stemming from but not limited to annoyance. Providing for new or intensified sensitive activities (ASAN) within the Airport's noise

boundaries would have the effect of bringing more people to aircraft noise and would potentially or inevitably exacerbate these health effects, in terms of the number of people experiencing them. The degree of effect could increase as airport operations change and adapt to changing circumstances and demand. This could occur from the rearrangement of existing, permitted activities on or at the Airport for example (e.g. new flight paths, or relocation of noisy activities on the airport (helicopters, engine testing locations, etc)). Allowing more people to experience adverse health effects would not, in my view, equate with 'enabling all people and communities to provide for their health and safety, now and into the future', as required by Objective 1.

50. Furthermore, Airports are not static but constantly changing as new technologies evolve and demand arises, as Ms Brooks evidence highlights. Objective 1 is forward looking – focusing on future outcomes, not only what is occurring today. Current aircraft noise levels are not representative of permitted future levels - the OCB and ANB provide for a level of growth.. I consider these are also relevant matters under Objective 1. The potential for adverse effects on the Airport, which the NPS-UD recognises as NSI, therefore must be taken account of when deciding how to implement the NPS-UD, including Policy 5.

51. Additionally, this approach also supported by a number of other provisions of the NPS-UD, including:

    a. The recognition of the Airport as NSI.

    b. Objective 6, which requires that local authority decisions on urban are *integrated with infrastructure planning and funding decisions; and strategic over the medium and long term*. This reinforces the need for urban planning to align with major infrastructure like Queenstown Airport.

    c. Policy 10 which instructs local authorities, when implementing the NPS-UD, to e*ngage with providers of nationally significant infrastructure.* This includes Queenstown Airport, reinforcing its that must be considered in land use and urban planning decision-making.

52. Together, these provisions provide national-level policy support for recognising and protecting the operational needs of Queenstown Airport in urban and infrastructure planning.

53. Furthermore, in my view, the notified approach, in so far as is does not provide for intensification within the Airport's OCB and ANB, is necessary to align with and give effect to other higher order statutory planning documents, such as the OPRS in particular and the PORPS, both of which highlight that Queenstown Airport is regionally significant infrastructure and require its protection from reverse sensitivity risk, as I discuss later in my evidence. These policy documents are relevant to, and in the case of the ORPS, must be given effect to by, the Variation (RMA section 75(3)).

54. In summary, while I consider that the notified Variation is generally appropriate (albeit that I prefer Option 1 - no changes to the zoning within the OCB or the related rules or standards, as I discuss next) and, in so far as it does not provide for intensification within Queenstown Airport's OCB and ANB, it is supported by and implements the NPS-UD and other higher order statutory planning documents, my reasoning somewhat differs to that expressed by Ms Bowbyes.

Section 32 Evaluation - Options Considered

55. The Council's reporting for the Variation states that *"[w]here a constraint exists, this does not necessarily mean intensification should not be enabled, rather, the NPS-UD (and the RMA) expects local authorities to carry out a comprehensive analysis, and seek to enable increased (commensurate) heights and densities while managing constraints appropriately*"[10]. This aligns with NPS-UD Policy 3.33.

56. Accordingly, as the Council's section 32 reporting details, in formulating the Variation, the Council considered three options regarding the OCB constraint:[11]

    a. Status Quo – no changes to the zoning within the OCB or the related rules or standards (**Option 1**).

    b. Provision changes only – no changes to the zoning of land within the OCB but changes to the provisions (excluding changes to existing densities of Activities

[10] Ibid
[11] Section 6.2.5, page 41 and 42, Section 32 report, dated 16 May 2023 (updated 21 August 2023)

Sensitive to Aircraft Noise enabled (ASAN)) in line with the remainder of the zones (**Option 2**).

c. Change to zoning and provisions – changes to zoning (rezone Local Centre Shopping Zone (**LSCZ**) to Business Mixed Use Zone (**BMUZ**) and Lower Density Suburban Residential Zone (**LDSRZ**) to Medium Density Residential Zone (**MDRZ**)) and changes to provisions in line with the remainder of the zones, including removing density restrictions (Rule 16.4.19) for Activities Sensitive to Aircraft Noise in the BMUZ within the OCB (**Option 3**).

57. In evaluating the options under section 32, the Council ranked Option 2 – Provision changes only, the highest, on the basis that it "*achieves an appropriate balance between intensification within the OCB while not significantly compromising the safety and efficiency of the airport operations"* while also noting that *"[t]his option could have a marginal increase in the amount of activities sensitive to Airport Noise that could establish within the OCB, due to relaxing the recession planes that adjoin the residential zoned land within the LSCZ and the BMUZ, but it is not anticipated to compromise airport operations."*

58. I generally support this approach, however, given the uncertainty over the degree of increase in Activities Sensitive to Airport Noise (**ASAN**) that could establish within the OCB under Option 2 - which is not detailed in the Council's reporting - I prefer Option 1 as the most appropriate option in terms of section 32. I expand on this later in my evidence.

QAC SUBMISSION

59. QAC lodged a submission and further submission on the Variation. I assisted with preparing QAC's submissions.

60. QAC's submission generally supports the Variation in so far as it does not provide for densification within the ANB or OCB. However, the submission expresses a preference for Option 1 (no changes to the zoning or provisions within the OCB), because the Council reporting does not quantify the potential ASAN increase under Option 2.

61. QAC's submission on the Variation seeks that the existing PDP regime, encapsulated Option 1, is not disrupted by but is carried through in the Variation. In essence,

underpinning QAC's submission (and its further submissions, which I address later) is a concern to ensure that additional ASAN are not enabled within the Airport's OCB or ANB, as this has would increase the risk of adverse amenity and health effects for the community, and reverse sensitivity effects for the Airport with the potential to adversely impact Airport operations, with flow on adverse social and economic effects for the district's community. I share QAC's concerns.

62. The basis for QAC's position is predicated on established airport noise management land use planning principles and is founded in the existing PDP regime and supported by the higher order statutory planning documents. I now address these. I follow with an evaluation of QAC's and other parties' submissions against these principles and the applicable policy framework.

LAND USE PLANNING PRINCIPLES AND APPLICABLE POLICY REGIME

New Zealand Standard for Airport Noise Management and Land Use Planning

63. NZS6805:1992 is the New Zealand Standard for Airport Noise Management and Land Use Planning, (**NZS6805** or **Standard**) and is widely acknowledged as the primary guidance document for addressing aircraft noise in relation to land use around airports in New Zealand.

64. NZS 6805 was published by the Standards Association of New Zealand in to provide a consistent approach to noise planning around New Zealand airports, with a goal to minimise these adverse effects.

65. The Standard recommends the *implementation of practical land use planning controls and airport management techniques to promote and conserve the health of people living and working near airports, without unduly restricting the operation of airports*.[12]

66. The Standard uses the "Noise Boundary" concept as a mechanism for local authorities to:

    a. establish compatible land use planning around an airport; and

    b. set noise limits for the management of aircraft noise at airports.

[12] New Zealand Standard 6805:1992: Airport Noise Management and Land Use Planning (NZS 6805:1992); Section 1.1.3, page 5.

67. The Noise Boundary concept involves "fixing" an Outer Control Boundary (**OCB**) and a smaller, much closer Air Noise Boundary (**ANB**) around an airport. At Queenstown Airport, the noise boundaries represent future aircraft noise levels based on growth predictions. Noise experienced today is lower than what the noise boundaries allow.

68. The ANB is a "*mechanism for local authorities to establish compatible land use planning* and to set limits for the management of aircraft noise at airports where noise control *measures are needed to protect community health and amenity values*[13]". The ANB defines the area where noise levels are expected to exceed 65dB L_{dn}. Under the New Zealand Standard, new noise-sensitive activities such as residential housing, schools, and hospitals are recommended to be prohibited within this area.

69. The Outer Control Boundary (**OCB**) defines the area where noise levels are expected to reach 55dB L_{dn}. The New Zealand Standard recommends that any new residential dwellings, schools, hospitals or other noise sensitive uses (**ASAN**) should be prohibited within the OCB, unless the District Plan permits such uses. Then they should be subject to a requirement to incorporate appropriate acoustic insulation to ensure a satisfactory internal noise environment. The New Zealand Standard also recommends that alterations or additions to existing residences or other ASAN inside the OCB should be appropriately insulated from aircraft noise to achieve an acceptable internal design sound level.

70. In addition to land use controls, the Standard recommends maximum noise emission limits for an airport, but it does not specify operational procedures or how these limits are to be achieved. This is consistent with the general approach to noise control in New Zealand, in that it is left to the airport operator to best decide how to manage its activities to comply with an agreed level of noise.

Proposed District Plan – Existing Regime

71. In 1995, airport noise boundaries were introduced into the Queenstown Lakes District Plan with a view to establishing compatible land use planning around the Airport and to set noise limits for the management of aircraft noise in accordance with NZS 6805.

[13] NZS 6805:1992, Section 1.1.2, page 5.

The noise boundaries provided for future levels of airport operations based on projected growth out to 2015.

72. In or around 2007 new noise modelling was undertaken, based on updated growth predictions. The modelling resulted in the preparation of new, expanded noise boundaries to cater for predicted growth out to 2037 - a 25-year horizon.

73. The new boundaries were introduced into the Operative District Plan (**ODP**) via a Plan Change in or around 2010 - Plan Change 35. The aim of PC35 was to establish a framework to manage land use surrounding Queenstown Airport, while accommodating anticipated growth in aircraft activity through to 2037. The plan change introduced amendments to the zone provisions applying to land within the new noise boundaries, acknowledging the potential for increased noise exposure.

74. The foundation for the approach promoted by the plan change was NZS 6805, modified to recognise the existing planning framework. More particularly, in determining how best to incorporate effective aircraft noise management provisions into Plan Change 35, the decision was made to retain, where practical, the overall structure of the Operative District Plan. PC35 prohibited any new ASAN inside the OCB and ANB where these were not already enabled by the operative zoning (i.e., in the Rural, Industrial and Frankton Flats zones), generally adopting the NZS:6805 recommendations. However, for zones where ASAN were already enabled, the more moderated approach adopted was to continue to allow new residential dwellings and alterations and additions to existing dwellings to be built provided they occupied an already zoned site (e.g., Low Density Residential Zone, Local Centre Shopping Zone (**LCSZ**, then called the Corner Shopping Zone)) and the dwelling incorporated appropriate sound insulation and mechanical ventilation measures (as necessary) at the property owner's cost to achieve a satisfactory internal noise environment.

75. In essence, the approach was to grandfather existing development rights, but to otherwise not allow any increase in ASAN within the new noise boundaries. In addition, PC35 promoted strong policy based dissuasion against the promulgation of further plan changes that would result in land within the OCB and ANB being rezoned for noise sensitive (ASAN) development.

76. To complement the land use management regime under PC35, QAC promoted, via a notice of requirement (**NoR**), changes to the Aerodrome Purpose Designation (Designation 2) to introduce obligations on QAC for the management and mitigation of noise generating activities at the airport. Specifically:

a. An obligation on QAC to offer 100% funding of noise mitigation for Critical Listening Environments[14] of existing buildings containing ASAN located within the new ANB, to achieve a specified indoor noise level[15].

b. An obligation on QAC to offer to part fund retrofitting, over time, of mechanical ventilation of any Critical Listening Environment within existing buildings containing ASAN between the new ANB and the 2037 60dB Noise Contour (this contour representing where aircraft noise levels of 60dn L_{dn} are predicted to be reached in 2037).

c. Monitoring requirements to ensure that aircraft noise complies with limits set by the new noise boundaries;

d. A requirement for QAC to prepare and implement a Noise Management Plan; and,

e. A requirement for QAC to establish a Noise Liaison Committee.

77. The dual strategy for managing aircraft noise effects at Queenstown Airport —using the designation mechanism to address QAC's responsibilities, alongside the introduction of new or revised objectives, policies, and methods within the surrounding zones to reflect the community's role - was endorsed by the Environment Court in 2013.

78. The PDP was notified in 2015. The PDP by and large upholds the PC35 approach, particularly in so far as it depicts the 2037 noise boundaries on the planning maps and does not enable the establishment or intensification of ASAN within the noise boundaries where this was not provided for under the former (ODP) regime, generally

[14] Defined in the PDP as: *"any space that is regularly used for high quality listening or communication for example principle living areas, bedrooms and classrooms but excludes non-critical listening environments."*
[15] 'The 'Indoor Design Sound Level' which the OPD and PDP defines as "*40 dB Ldn in all Critical Listening Environments"*

aligning with NZS:6805. QAC's obligations under Designation 2 to manage airport noise have been rolled over into the PDP.

Proposed District Plan Air Noise Boundary

79. The PDP ANB encompasses parts of Frankton that already contain residential development, particularly west of the main runway. It encapsulates parts of the Airport Zone, the Lower Density Suburban Residential Zone (**LDSRZ**), the Remarkables Park Zone (**RPZ**) and the Open Spaces Zones. The ANB is the inner orange outline as shown in **Figure 1**. **Figure 2** shows the ANB relative to the PDP zones. The LDSRZ is shown by the lighter brown colour, the LCSZ by pink, and the BMUZ by red. Bright green is the Airport zone. The darker brown and olive are the Open Spaces Zones. Purple is the Industrial Zone.

Figure 1: ANB shown as the inner orange outline with the OCB shown as the outer orange outline (QLDC Planning Maps)

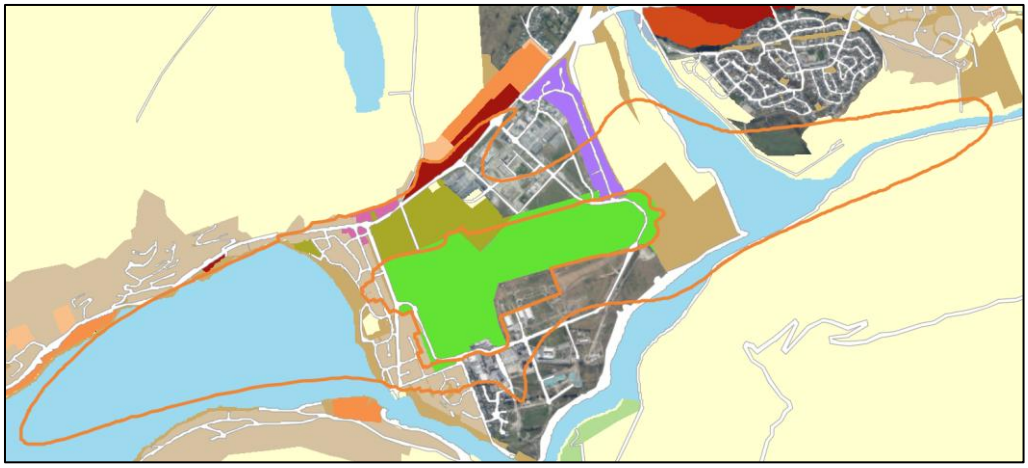


Figure 2: ANB and OCB noise contours shown over existing PDP zoning (QLDC Planning Maps)

80. Of the zones shown in Figure 2 within the OCB, the LDSRZ is addressed by the Variation, however no changes to the LDSRZ density provisions that apply to land within the ANB are proposed. In my view, this is appropriate. I outline my reasons shortly.

Proposed District Plan Outer Control Boundary

81. The PDP OCB is much larger than the ANB, encompassing land north, south, east and west of Queenstown Airport, including parts of the LDSRZ, RPZ, Open Spaces Zones, LCSZ, BMUZ, Frankton Flats A and B Zones (**FFZ A** and **B**), and the Industrial Zone. The OCB is the outer orange outline as shown in **Figure 1**, above. The affected zones are shown in Figure 2. The RPZ and Frankton Flats A and B Zones are not shown in Figure 2 as these zones have not yet been brought under the PDP (i.e., they are ODP zones).

82. Of these zones, the LDSRZ, LSCZ, and BMUZ are addressed by the Variation. Minor changes are proposed to building heights in the LDSRZ to permit the same 8m limit for sloping and flat sites as well as introducing a new permitted rule for existing sites under 450m^2 to contain one residential unit. For the LCSZ at Frankton (which is wholly within the OCB), the Variation proposes to amend Setbacks and Sunlight Access control standards. The Variation proposes to increase the permitted building height in the Frankton North BMUZ (which is partly within the OCB and underneath the OLS) from 12m to 16.5m. The degree to which these changes may enable additional ASAN within the OCB is unknown, and for this reason I prefer full retention of the status quo (Option 1) as I have mentioned earlier.

National Policy Statement-Infrastructure and Reverse Sensitivity

83. Reverse sensitivity is a key issue for airports worldwide, and for many (most) other infrastructure providers, and potentially a key effect arising from the Variation.

84. The meaning of effect is outlined in Section 3 of the RMA 1991 as follows:
In this Act, unless the context otherwise requires, the term effect includes—

a. any positive or adverse effect; and

b. any temporary or permanent effect; and

c. any past, present, or future effect; and

d. any cumulative effect which arises over time or in combination with other effects—

e. regardless of the scale, intensity, duration, or frequency of the effect, and also includes—

f. any potential effect of high probability; and

g. any potential effect of low probability which has a high potential impact.

85. The definition clarifies that in the RMA context, 'effects' include potential effects, regardless of the scale or intensity of the effect, effects of high probability, and effects of low probability but high potential impact.

86. Reverse sensitivity is often thought of as an existing activity being required to significantly limit operations or cease completely due to pressure or complaint from the establishment of new, sensitive, incompatible activities. However, reverse sensitivity can manifest more subtly. In an airport context, increases in the likelihood of noise complaints or community pressure to restrict airport operations can give rise to reverse sensitivity effects that manifest as restrictions on flight times (curfews) or aircraft types, prescribed flight tracks (and runway use), noise abatement take off procedures and noise charges, for example. In the Queenstown context, such restrictions could impact Queenstown's attractiveness to airlines as a destination, potentially resulting in fewer or less convenient scheduled flights/passenger services over time.

87. Mr Day has detailed a number of examples of contraints/reverse sensitivity effects that have been experienced by airports worldwide. I rely on Mr Day's evidence and also note his comment that the New Zealand Standard was developed to avoid more residents being affected by aircraft noise and to encourage sensible land use planning; that is, to minimise reverse sensitivity risk and appropriately manage adverse effects.

88. Such constrains can directly compromise the Airport's ability to function efficiently and effectively, which can impact upon the delivery of social and economic benefits for the community.

89. Reverse sensitivity effects may also be at play when an existing lawfully established activity faces opposition or constraint to development and expansion.

90. New national direction is proposed for infrastructure via a new national policy statement (the National Policy Statement-Infrastructure (**NPS-I**)), the purpose of which

is to provide a consistent approach to enable and protect national infrastructure and infrastructure servicing every community in New Zealand. At the time of writing this evidence, the NPS proposal is out for consultation, closing on 27 July 2025.

91. The consultation document on the NPS proposal includes a definition of reverse sensitivity, as follows:

"*Reverse sensitivity in relation to infrastructure, means the vulnerability of existing infrastructure activity to complaint, burden, or constraint from a new or more intensive activity proposed or located near the existing infrastructure*."

92. The NPS-I proposes a policy framework that enables a more streamlined and efficient system that supports infrastructure delivery.

93. Proposed Policy 1 – "*Providing for the benefits of infrastructure*" addresses planning decisions about infrastructure, which decisions must:

…"(2) ensure that the widespread, dispersed, and ongoing national, regional, or local benefits of infrastructure are recognised and provided for relative to any localised adverse effects on the environment"…

94. Under proposed Policy 1, planning decisions must also recognise:

…"(3) (a) the significant risks to, and impacts on, public safety, the well-being of people and communities, and the environment that occur when infrastructure services are compromised; and
(b) the significant benefits of infrastructure to the functioning of districts, regions and New Zealand and to the well-being of present and future generations;"…

95. The NPS-I recognises reverse sensitivity as a risk to infrastructure. Proposed Policy 9 – "*Planning for and managing the interface and compatibility of infrastructure*" directs planning decisions to:

"*…manage the interface between existing, consented and planned infrastructure and other activities to ensure:*

a) infrastructure and other activities are as compatible as practicable;

b) the safe, efficient and effective operation, maintenance and upgrade of existing, consented or planned infrastructure is not compromised by the adverse effects of other activities;

96. In order to do so, local authorities must:

"(2)(a) engage with infrastructure providers to:

i. understand their existing, consented and planned infrastructure activities and medium to long-terms plans;

ii. identify appropriate buffers and other methods to protect existing, consented and planned infrastructure from the adverse effects of sensitive and incompatible activities, including direct effects, reverse sensitivity effects, and risks to health and safety;

iii. support the strategic integration of infrastructure with land use activities;

(b) identify:

i. activities that are particularly sensitive to the effects of infrastructure;

ii. activities that are compatible with infrastructure, or potentially compatible with appropriate buffers, design standards or mitigation measures;

iii. infrastructure activities, such as social infrastructure, that are sensitive to the effects of other infrastructure;

(c) apply a range of methods, including, where appropriate:

i. the use of buffers in plans to manage sensitive and incompatible activities near infrastructure;

ii. design standards to manage the effects of infrastructure on other activities;

iii. special purpose zoning and other spatial planning layers; and

(d) ensure that measures to avoid and manage the effects of other activities on infrastructure are consistent with relevant national and international standards, regulations, and guidance."

97. Proposed Policy 10 directs that *in assessing and managing the interface between existing, consented and planned infrastructure and other activities, planning decisions must:*

"(a) recognise that noise, vibration, dust and visual effects are all typical effects associated with infrastructure activities that can be managed where practicable but not completely avoided; and

(b) recognise that:

i. amenity values change due to a range of factors;

ii. changes in amenity from infrastructure activities are necessary to achieve well-functioning urban and rural environments; and

(c) apply the general principle that the primary responsibility for managing adverse effects is on the new activity (including infrastructure) while allowing for flexibility for site- and project specific circumstances."

98. The NPS-I's proposed approach provides nationally consistent direction to ensure infrastructure is protected from incompatible land use development. It recognises and seeks to address longstanding challenges around reverse sensitivity by shifting planning practices to better protect infrastructure, reduce operational risk, and support long-term infrastructure resilience.

99. It recognises that infrastructure may have localised adverse effects, but widespread national, regional or local benefits.

100. It recognises that the effects of infrastructure, including noise effects can lead to changes in amenity over time, and that such effects are part of a functioning urban environment. It places the responsibility for mitigating these effects on new activities.

101. The NPS-I represents a necessary evolution in national direction to support well-functioning urban environments and ensures the benefits of infrastructure are not undermined by inappropriate proximity of sensitive activities.

102. I acknowledge the NPS-I has no legal weight at this point in time and that the consultation may result in changes to the scheme and structure currently proposed. Nonetheless, the proposal highlights at a national level the significance of infrastructure to community well-being and well-functioning urban environments, and the very real risk that reverse sensitivity and related planning decisions can create for key infrastructure.

Otago Regional Policy Statement 2019

103. The Otago Regional Policy Statement 2019 provides specific policy recognition of infrastructure and acknowledges its importance in providing for the social, economic and cultural wellbeing of people and communities. Of note are the following provisions:

a. An "airport" is explicitly included in the definition of infrastructure[16] :

b. Policy 4.3.2[17] explicitly recognises "airports and associated navigation infrastructure" as being nationally and regionally significant infrastructure.

c. Objective 4.3[18] seeks that infrastructure is managed and developed in a sustainable way. The related issue acknowledges that social and economic wellbeing depends on having adequate infrastructure, and that activities locating in proximity to infrastructure may lead to reverse sensitivity effects on that infrastructure.

d. Policy 4.3.3[19] requires planning processes to *provide for* the functional needs of infrastructure that has regional or national significance, including safety. "Functional needs" is defined to mean *the locational, operational, practical or technical needs of the infrastructure, including development and upgrades*[20]. This includes airport operations, which rely on specific locational, operational, and technical conditions.

e. Policy 4.3.4[21] sets out a hierarchy for the management of the effects of infrastructure, including in sensitive areas (e.g. outstanding natural landscapes).

f. Policy 4.3.5[22] requires that infrastructure with national or regional significance is *protected* including by;

    i. *Restricting* the establishment of activities that may result in reverse sensitivity effects;

    ii. *Avoiding* significant adverse effects on the functional needs of such infrastructure;

    iii. *Avoiding, remedying or mitigating* other adverse effects on the functional needs of such infrastructure;

[16] Glossary, Infrastructure, page 131 and 132 of the Otago Regional Policy Statement, as at 4 March 2024
[17] Policy 4.3.2, page 55 and 56 of the Otago Regional Policy Statement
[18] Objective 4.3, page 55 of the Otago Regional Policy Statement
[19] Policy 4.3.3, page 56 of the Otago Regional Policy Statement
[20] Glossary, "functional needs", page 131 of the Otago Regional Policy Statement
[21] Policy 4.3.4, page 56 and 57 of the Otago Regional Policy Statement .
[22] Policy 4.3.5, page 57 of the Otago Regional Policy Statement .

iv. *Protecting infrastructure corridors*, which in my view includes land within the Airport's noise boundaries, from activities that are incompatible with the anticipated effects of that infrastructure, now and for the future.

104. These provisions collectively establish a very strong policy directive for the recognition and enablement of the regionally and nationally significant Queenstown Airport, and its protection. Protection is to be achieved by avoiding significant effects on the infrastructure's functional needs and restricting activities that may result in reverse sensitivity effects. This is necessary to ensure social and economic wellbeing, where that depends on the infrastructure.

Proposed Otago Regional Policy Statement 2021 (PORPS)

105. The Proposed Otago Regional Policy Statement 2021 contains similar themes as the 2019 RPS with regards to infrastructure, acknowledging its importance in providing for the social, economic and cultural wellbeing of people and communities. The following provisions are of particular relevance presently:

a. Nationally Significant Infrastructure is defined and includes "*any airport (but not its ancillary commercial activities) used for regular air transport services by aeroplanes capable of carrying more than 30 passengers*"[23]. This covers Queenstown Airport.

b. Regionally Significant Infrastructure is also defined and includes Queenstown Airport and the associated navigation infrastructure.[24]

c. Objective EIT-INF-O4[25] seeks effective, efficient, safe and resilient infrastructure, nationally significant infrastructure and regionally significant infrastructure which enables the people and communities to provide for their social and cultural well-being, their health and safety, and supports sustainable economic development and growth in the region.

[23] Definitions, page 37 of the Proposed Otago Regional Policy Statement, as at 7 May 2025
[24] Definitions, page 41 and 42 of the Proposed Otago Regional Policy Statement, as at 7 May 2025
[25] Objective 4, page 174 of the Proposed Otago Regional Policy Statement, as at 7 May 2025

d. Objective EIT-INF-O5[26] seeks the co-ordination of landuse change and the development of infrastructure to reduce environmental effects and improve efficiency in the delivery, operation and use of the infrastructure.

e. Policy EIT-INF-P10[27] requires decision-making to take account of the functional and operational needs of nationally or regionally significant infrastructure.

f. Policy EIT-INF-P12[28] provides for upgrading or developing nationally or regionally significant infrastructure like airports while ensuring it is resilient, efficient, and as far as practicable aligned with long-term planning.

g. Policy EIT-INF-P13[29] allows infrastructure to locate in sensitive areas if functionally necessary, with mitigation or compensation for environmental effects.

h. Policy EIT-INF-P14[30] encourages assessment of alternatives and opportunities to reduce effects when upgrading or developing infrastructure.

i. Policy EIT-INF-P15[31] requires the *protection* of nationally and regionally significant infrastructure by to the extent reasonably practicable *avoiding activities* that may or result in reverse sensitivity effects or give rise to adverse effects on the functional or operational needs of the infrastructure.

j. The explanation and principal reasons sections reinforce that this infrastructure is *"...fundamental to the health and safety of communities... and has operational and functional constraints that dictate location and design...[32]",* and that *"decisions on allocating natural and physical resources shall make provision for the functional needs or operational needs of nationally significant infrastructure and regionally significant infrastructure."[33]*

106. These provisions collectively establish Queenstown Airport as regionally and nationally significant infrastructure, reflecting its critical role in supporting the region's economic,

[26] Objective 5, page 174 of the Proposed Otago Regional Policy Statement, as at 7 May 2025
[27] Policy 10, page 174 of the Proposed Otago Regional Policy Statement, as at 7 May 2025
[28] Policy 12, page 175 of the Proposed Otago Regional Policy Statement, as at 7 May 2025
[29] Policy 13, page 175 and 176 of the Proposed Otago Regional Policy Statement, as at 7 May 2025
[30] Policy 14, page 176 of the Proposed Otago Regional Policy Statement, as at 7 May 2025
[31] Policy 15, page 176 of the Proposed Otago Regional Policy Statement, as at 7 May 2025
[32] Principal Reason 2, page 178 of the Proposed Otago Regional Policy Statement, as at 7 May 2025
[33] Ibid

social and cultural wellbeing, and require its protection from encroaching sensitive activities that may result in reverse sensitivity effects or adversely impact its functional and operational needs. The policies support the ongoing operation, development, and protection of Queenstown Airport, recognising it as vital to the resilience, efficiency, and future growth of the region. I understand that a number of the EIT provisions are under appeal and have been successfully mediated, resulting in changes that strengthen the recognition of, and protection afforded to NSI and RSI.

107. The infrastructure (EIT) provisions in the PORPS are complemented by provisions addressing urban form and development,[34] which require the development and change of urban areas to be integrated with infrastructure[35] and that urban intensification contributes to establishing or maintain the qualities of a well-functioning urban environment[36]. I understand that a number of the UFD provisions are under appeal and have been successfully mediated, resulting in changes that strengthen the recognition of, and protection afforded to NSI and RSI when undertaking urban development, including urban intensification.

Queenstown Lakes Proposed District Plan

108. The PDP contains a regime that recognises the significance of Queenstown Airport and seeks to protect it from reverse sensitivity effects, at both a policy and rule level.

109. At a policy level are the following Strategic objectives and policies:

    a. Chapter 3 – Strategic Direction

        i. 3.2.2.1: Urban development occurs in a logical manner so as to: … (h) be integrated with existing, and proposed infrastructure and appropriately manage effects on that infrastructure.

        ii. 3.3.6: Recognise that Queenstown Airport makes an important contribution to the prosperity and resilience of the District.

        iii. 3.3.24B: Protect Regionally Significant Infrastructure by managing the adverse effects of incompatible activities.

[34] PoRPS 2021, UFD – Urban form and development chapter
[35] PoRPS 2021, Objective UFD-O1
[36] PoRPS 2021, Policy UFD-P3

b. Chapter 4 – Urban Development

i. 4.2.2 A - A compact, integrated and well designed urban form within the Urban Growth Boundaries that:
   i. is coordinated with the efficient provision, use and operation of infrastructure and services; and
   ii. is managed to ensure that the Queenstown Airport is not significantly compromised by the adverse effects of incompatible activities.

ii. 4.2.2.1 Integrate urban development with existing or proposed infrastructure so that:
   a. Urban development is serviced by infrastructure of sufficient capacity; and
   b. reverse sensitivity effects of activities on regionally significant infrastructure are minimised;

iii. 4.2.2.14 Ensure appropriate noise boundaries are established and maintained to enable operations at Queenstown Airport to continue and to expand over time.

iv. 4.2.2.15 Manage the adverse effects of noise from aircraft on any Activity Sensitive to Aircraft Noise within the airport noise boundaries while at the same time providing for the efficient operation of Queenstown Airport.

v. 4.2.2.16 Protect the airport from reverse sensitivity effects of any Activity Sensitive to Aircraft Noise via a range of zoning methods.

vi. 4.2.2.17 Ensure that Critical Listening Environments of all new buildings and alterations and additions to existing buildings containing an Activity Sensitive to Aircraft Noise within the Queenstown Airport Air Noise boundary or Outer Control boundary are designed and built to achieve appropriate Indoor Design Sound Levels.

c. Chapter 7 – Lower Density Suburban Residential Zone

i. 7.2.2 Development of Activities Sensitive to Aircraft Noise is limited within the Queenstown Airport Air Noise Boundary and Outer Control Boundary in recognition of the amenity (noise) constraints now and also likely in the foreseeable future as a result of its increasing intensity of operation and use.

ii. 7.2.2.1 Discourage the creation of any new sites or infill development for Activities Sensitive to Aircraft Noise within the Air Noise Boundary and between the Air Noise Boundary and the Outer Control Boundary on land around Queenstown Airport.

110. These objectives and policies recognise the importance of Queenstown Airport and seeks to protect it through a variety of methods, including zonings, limiting the number of ASAN within the OCB and ANB, discouraging the creation of new residential sites and infill within the OCB and ANB, and seeking to minimise – which, per the dictionary definition, means reduce to the smallest possible level of amount[37]/ reduce to the smallest possible degree - reverse sensitivity risk, which together comprise the management regime to ensure that the Queenstown Airport is not significantly compromised by the adverse effects of incompatible activities. The policies also require that all new ASAN within the ANB and OCB are designed and built to achieve a specified indoor sound level, which recognises development rights for ASAN that exist in some zones and which have been grandfathered in the PDP, as I have described earlier.

111. In effect, the PDP strikes a deliberate balance between enabling growth and protecting critical Airport infrastructure. It does so by clearly identifying Queenstown Airport as a resource that must be safeguarded (protected) and by implementing spatial and design-based tools to manage land use compatibility and prevent reverse sensitivity from undermining its operation.

112. To implement these objectives and policies, the PDP, at rule level (relevantly):

a. Makes provisions (albeit limited) for ASAN in the OCB and ANB, where such provision existed under the former (ODP) regime.

[37] https://dictionary.cambridge.org/dictionary/english/minimize#google_vignette

b. Within the LDSRZ OCB, makes limited provision for new or alterations/additions to existing ASAN. Minimum lots size is 600m^2 (PDP Rule 27.6.1) and the maximum density is one residential unit per 450m^2 (PDP Rule 7.4.3(i)). These provisions grandfather developments rights that existed under the former ODP regime, while limiting the establishment of new ASAN within the OCB.

c. Within the LSCZ, which is located wholly within the OCB, limited provision for ASAN is made, where residential and visitor accommodation activities (ASAN) may only establish above ground floor level (PDP Rule 15.5.6), subject to acoustic insulation requirements (PDP Rule 15.5.4) and where buildings may be no higher than 10m (PDP Rule 15.5.7.b). Some sites within the LSCZ have additional limitations on ASAN numbers (a collective maximum of 10 ASAN for 16, 18, 18B and 20 McBride Street – PDP Rule 15.5.12, and a maximum of 50 residential units (ASAN) for 1 Hansen Road – PDP Rule 15.5.5(d)). These provisions grandfather development rights that existed under the former ODP regime.

d. No provision for ASAN is made within the BMUZ OCB (PDP Rule 16.4.19). The prohibition recognises the former Rural zoning of this land, which did not provide for ASAN (PDP Rule.

113. These rules implement strategic direction Objective 3.2.2.1[38] by assisting to protect Queenstown Airport's operation as it is recognised as regionally significant infrastructure by restricting the establishment of ASAN within the ANB and OCB in line with this objective. The rules also implement Objective 3.2.2.2[39] by grandfathering existing development rights but prevent expansion of ASAN in high-noise areas, particularly where none previously existed (e.g., BMUZ), to avoid reverse sensitivity. Also implemented is Policy 3.3.30[40] by limiting or prohibiting ASAN in proximity to the Airport, thereby reducing the risk of complaints or pressure to restrict airport operations. In regard to the Urban Development chapter, the rules implement Policy

[38] "Recognise, provide for and protect the role and function of regionally significant infrastructure."
[39] "Avoid reverse sensitivity effects of incompatible land use activities being located near regionally significant infrastructure."
[40] "Ensure urban development is avoided where it would result in reverse sensitivity effects on the ongoing operation of Queenstown Airport."

4.2.2.15[41] by limiting and controlling ASAN where it previously existed, but otherwise restricting or prohibiting ASAN, ensuring development does not undermine airport operations. Finally, the rules also implement Policy 4.2.2.1[42] by limiting ASAN in the OCB and/or prohibiting in the ANB ensures that new development does not conflict with airport operations.

QAC'S SUBMISSION AS IT RELATES TO THE POLICY CONTEXT

114. QAC's submission on the Variation seeks that the existing PDP regime, summarised above, is not disrupted by but is carried through in the Variation, this being necessary to ensure protection of the significant Airport infrastructure, and to implement the PDP and higher order policy direction.

115. As I have recorded earlier, in essence, underpinning QAC's submission (and its further submissions, which I address next) is a concern to ensure that additional ASAN are not enabled within the Airport's OCB or ANB, as this has would increase the potential for adverse health and amenity effects for the community, and the risk of reverse sensitivity effect for the Airport with the potential to adversely impact Airport operations, with flow on adverse social and economic effects for the district's community.

116. I agree with QAC's submission points. The existing PDP and higher order policy framework recognises, provides for and seeks to protect the Airport as NSI/RSI. It recognises Queenstown Airport as making a significant contribution to the resilience and prosperity of the District. It recognises also reverse sensitivity as a palpable risk to the Airport infrastructure if noise sensitive activities that are incomparable with airport operations are allowed to establish in high noise areas around the Airport.

117. In my view, the current PDP regime is the most appropriate and effective approach for managing aircraft noise effects on ASAN and for protecting the Airport from reverse sensitivity risk, and the regime should be retained or equivalent provisions promoted through the Variation.

[41] "Manage the adverse effects of noise from aircraft on any Activity Sensitive to Aircraft Noise within the airport noise boundaries while at the same time providing for the efficient operation of Queenstown Airport."
[42] "Ensure development is integrated with existing infrastructure and reverse sensitivity effects on regionally significant infrastructure are minimised."

118. For Queenstown Airport, the potential for reverse sensitivity effects to arise is viewed as a significant issue given the proximity of the Airport to sensitive uses (including residential), the degree to which the community relies on or derives social and economic benefits from the Airport, and the higher order policy framework which recognises the reverse sensitivity concept and the risk it poses for the Airport (as regionally significant infrastructure) and seeks to restrict the establishment of incompatible activities to ensure its protection. This risk must be recognised and addressed when making land use planning decisions, including decisions on the Variation.

119. I consider that limiting the level of ASAN in the areas most affected by aircraft noise – the noise boundaries - is the most appropriate method to minimise the risk of reverse sensitivity and achieve the objectives and policies of the PDP and the higher order statutory planning documents, and it is the method that is recommended by the New Zealand Standard. It is necessary not only to protect the transport connections and other service and facilities provided by the nationally and regionally significant Queenstown Airport, but also due to the significant direct and indirect social and economic effects the community derives from Airport activities and operations, as detailed by Ms Brook. Any relaxation of this approach, by rezoning land for ASAN or making provision for ASAN intensification within the noise boundaries, has the potential to lead to increased complaint about or opposition to aircraft noise and aircraft activities, including the with regards to the redevelopment and/or lawful expansion of existing activities, which in turn has the potential or impact the efficient operation and function of the Airport. If Airport operations are inefficient, restricted or curtailed, the social and economic well-being of the community could be imperilled to a significant degree.

120. Furthermore, making provision for new ASAN within the noise boundaries, through rezonings or intensification, carries a risk of adverse health effects for those people using those ASAN, as detailed by Mr Day.

121. In my opinion, any decision that brings additional people to the impact of aircraft noise would not appropriately provide for the needs of future generation and would inevitably lead to poor land use planning outcomes in the future. It would increase, not minimise reverse sensitivity risk, and in so doing, would not satisfactorily protect

the regionally and nationally significant Airport infrastructure. It would not present the most appropriate way to achieve the PDP objectives and policies, or those in the OPRS, PORPS, and NPS-UD.

122. I reiterate that reverse sensitivity is not a risk for only the Airport/Airport operations, but also the community, whose economic and social wellbeing is to at least some extent (if not a reasonable degree) dependant on the continued efficient and effective operation of the Airport. On this point, I agree with view expressed in the economic evidence on behalf of the Council, where Ms Fairgray acknowledges that while appropriately managed further intensification around Frankton is likely to be economically beneficial through increasing the housing choice in this location, "*this location is only likely to produce net economic benefits if it does not limit the current or future role and function of the airport."*[43] This is because *"The airport plays a core role within the District's economy and is likely to facilitate a sizeable share of activity within the district's urban environment and surrounding area. Visitor spending sustains a large share of the commercial activity within the District, which is directly reliant on the operation of the airport*."[44] I also share Ms Fairgray's view that "*any limitation to the current or future airport activity as a result of proximate future residential intensification may produce a significant net economic cost to the District and surrounding areas*"[45].

123. In my view it would be short-sighted to allow additional ASAN within the OCB, which could have the effect of impacting the efficiency and effectiveness of airport operations, or restricting airport operations, with significant flow on effects to economic and social wellbeing.

124. In my view, the current PDP regime, which is by and large adopted in the notified Variation, appropriately recognises the importance of and protects the Queenstown Airport, in that it:

    a. Provides for some further development but does not allow wholesale increase of ASAN, thereby minimising reverse sensitivity risk.

[43] Evidence of Susan Fairgray for QLDC date 6 June 2025, at 6.41 – 6.42
[44] Ibid
[45] Ibid

b. Recognises and protects the Airport as regionally and nationally significant infrastructure.

c. Implements higher order strategic policy.

125. My view is not altered by the NPS-UD, which was not enacted when the existing PDP regime was put in place. I have addressed how infrastructure is an essential component of a well-functioning urban environment earlier in this evidence. I have also noted that under RMA section 75(3) a district plan – and this Variation – must give effect to other statutory imperatives, such as those in the ORPS (and have regard to the PORPS) which direct that regionally significant infrastructure such as Queenstown Airport must be recognised and protected, including by restricting the establishment of activities that may result in reverse sensitivity effects, and protecting infrastructure corridors - which in my view includes land within the Airport's noise boundaries - from activities that are incompatible with the anticipated effects of that infrastructure, now and for the future (ORPS policy 4.3.5). In my view, the current land use planning regie that applies to the land within the Airport OCB and ANB gives effect this higher order policy decision, including that of the NPS-UD.

OTHER SUBMISSIONS

126. Other parties have made submissions that generally or specifically or seek to allow the establishment of additional ASAN within the OCB. Those relevant to the Queenstown Airport are as follows:

a. Increase Density within the OCB:
    i. NZ Infrastructure Commission (#1238).
    ii. Waka Kotahi (#200).
    iii. Ministry of Housing and Urban Development (#800).
    iv. Wood (#548).

b. Rezone and/or enable ASAN in the BMUZ north of Frankton-Ladies Mile / SH6, including within the OCB:
    i. No. 1 Hansen Road (#766).
    ii. City Impact Church (#775).
    iii. Lattitude 45 Development Ltd (#768).

c. Enable ASAN within the LCSZ (a consequence of height increases sought in the submission):

    i. Hansen Family Trust (#380).

d. Intensify within Operative District Plan Zones (Remarkable Parks Zone, Frankton Flats B Zone and rezone Rural land to LDSRZ or MDRZ):

    i. Smith (#44).

    ii. Oates (#632).

    iii. Queenstown Central (#191).

    iv. Grant/Perpetual Trust (#473).

e. Increase building height in the areas affected by the Obstacle Limitation Surfaces Designation (Designation 4):

    i. No. 1 Hansen Road (#766)

127. A map showing the location of land holdings for which submitters seek specific relief (rezonings or provision changes) is attached as **Annexure A.**

128. Most of these submissions directly seek or would have the effect of enabling the establishment of additional ASAN within the OCB for Queenstown Airport, as compared the existing PDP regime and the notified Variation.

129. QAC has further submitted in opposition to these submissions. For the reasons expressed above, I consider that the relief sought in these submissions is not appropriate. I set out further reasoning in the next sections of my evidence.

ASAN Increases

130. Submissions[46] seeking increased densities at Frankton would have the effect of allowing additional ASAN to establish within the Airport's noise boundaries. Allowing new/additional ASAN to establish within the noise boundaries would increase the number of people exposed to aircraft noise, which the evidence of Mr Day indicates that OCB levels can have significant effects on people's amenity, health and wellbeing.

131. This increased exposure can lead to increased community complaints and political pressure to curtail existing and future lawful airport activities, including future

[46] Submissions # 128, 200, 800 and 548

permitted activities. These complaints can influence planning decisions and legal outcomes, potentially resulting in operational restrictions such as flight curfews, altered flight paths, noise abatement take-off procedures, noise charges, or limitations on aircraft types—all of which can significantly hinder airport efficiency, effectiveness and growth, potentially compromising the long-term viability of the Airport and limiting its capacity to meet future transport, economic and social needs. Such outcomes have the potential to undermine the long-term operational certainty of the airport and compromise the intent of Policy 4.2.2.1, which is focused on safeguarding the function of strategic infrastructure through compatible and coordinated development patterns.

132. From a planning perspective, intensifying development within the Airport's noise boundaries undermines the purpose of the noise boundaries, which is to signal the extent of potential airport effects and manage land use accordingly. The OCB is intended to act as a buffer to prevent incompatible development from undermining airport operations. Increasing density within this noise boundary could necessitate costly mitigation measures, such as retrofitting buildings with noise insulation or compensating affected property owners, should the Airport seek to alter or expand its operations in the future.

133. Ultimately, maintaining lower densities and the 'status quo' within the OCB helps preserve the functional integrity of the airport, protects public investment in strategic infrastructure, and ensures the surrounding community is not exposed to unnecessary and avoidable adverse noise, amenity and health effects. It also provides better certainty for the airport operator when planning for the future.

134. As I have stated earlier, in my view, a planning framework or rules that allow more people to be exposed to aircraft noise, thereby increasing reverse sensitivity risk, would not ensure adequate protection of Queenstown Airport from this risk, and to this end, would not implement or achieve the higher order policies that I have detailed earlier, which recognise the Airport as regionally and nationally significant infrastructure and seek to protect from reverse sensitivity effects by avoiding and/or managing the establishment of new/additional sensitive activities (ASAN) within the Airport's noise boundaries. Case law has established that in a policy context "avoid" can mean "do not allow" and carries with it an expectation of prohibited or non-

complying activity status. A rule framework that enables additional ASAN, whether through provisions enabling intensification of or rezonings for ASAN would be at odds with this, whereas the current PDP regime, and for the most part the notified Variation, achieves it.

135. For the same reasons, submissions[47] that seek greater enablement of ASAN in the LCSZ (through height increases) and in the BMUZ OCB (through rezoning, removal of the ASAN prohibition and height increases) at Frankton North pose a serious risk to the ongoing operation and future development of Queenstown Airport. As just described, the OCB is specifically designed to identify the area within which aircraft noise effects may be significant and where development must be carefully managed to avoid reverse sensitivity conflicts. Introducing sensitive activities into this boundary increases the likelihood of noise complaints and community pressure to restrict airport operations, which could reduce Queenstown's attractiveness to airlines as a destination, potentially resulting the curtailment of passenger services over time and/or directly compromising the Airport's ability to function effectively.

A consenting pathway for new ASAN within the OCB

136. Some submitters[48] have suggested that the prohibition on new ASAN within the BMUZ OCB[49] should be deleted because zone provisions can be included that, subject to restrictions (such as requirements to use building materials that achieve reduced (internal) noise environments), enable new or additional ASAN to establish, while protecting Queenstown Airport and achieving the PDP strategic policy direction for the Airport.

137. I do not agree, for the following reasons:

    a. As Mr Day has detailed in his evidence, there has historically been, and continues to be, significant compatibility issues worldwide between airports and surrounding communities due to the noise effects from aircraft operations. Community response studies have found that aircraft noise is more annoying than most other sources of noise (including other transportation noise, such as road noise) and

[47] Submissions # 380, 766, 775, 768
[48] Submission #766 and Further Submissions by Latitude 45 Development Ltd (#1332) and City Impact Church (#1330)
[49] Rule 16.4.19 of the QLDC Proposed District Plan

annoyance due to aircraft noise has significantly increased over the past 45 years. This is despite reductions in aircraft noise, which now appear to be bottoming out. On the other hand, operational restrictions on airports have increased considerably over a similar period of time in response to community annoyance.

b. Aircraft noise is difficult to mitigate, given the source of the noise is at altitude and moving. This is compared to noise from a stationary, ground based source (such as industrial noise sources and road traffic), which may allow barriers or other shielding to be employed to minimise noise effects.

c. Research into annoyance has shown that at 55 to 65 dB Ldn (i.e. at OCB noise levels) some 26% to 46% of people are expected to be highly annoyed, which suggests a significant adverse noise effect on people if additional ASAN are allowed to establish within the OCB and the potential for significant adverse reverse sensitivity effects for QAC.

d. The level of sound insulation required in the 50 to 60 dB L_{dn} noise area (which includes the area within the BMUZ OCB) is provided by a standard house construction. No additional construction techniques or materials are required in this area. However, research into annoyance has shown that 26% to 46% of the population is still typically highly annoyed by aircraft noise in this environment, which indicates that sound insulation, on its own, is insufficient and land use controls in the form of density restrictions are the only real form of mitigation available in this case.

e. While building methods – such as acoustic insulation and mechanical ventilation - can effectively reduce indoor noise levels for buildings located within the Outer Control Boundary (**OCB**), these measures do not address the broader amenity impacts of aircraft noise on outdoor living. Queenstown offers a natural environment and outdoor lifestyle which are central to residents' quality of life, the inability to enjoy private outdoor spaces—such as decks, gardens, or patios—due to frequent and intrusive aircraft noise significantly diminishes residential amenity. Insulation may mitigate noise inside the home, but it does nothing to reduce the lived experience of aircraft noise when residents are outside. An unsatisfactory external noise environment is a potential source of residential

complaint with demands to reduce noise, affecting airport operations. Minimising the number of people affected by airport noise by restricting residential development is the most effective form of mitigation available in this case.

f. NZS:6805 refers to sound insulation as a fallback mitigation measure. Mr Day's view, with which I agree, is that the Standard prefers to 'avoid' the effects of airport noise, ahead of mitigation.

138. For these reasons, I do not agree with the Submitters that it would be appropriate to delete the prohibition on ASAN within the BMUZ OCB and to provide a consenting pathway for new ASAN to establish in this area. To do so could impact the efficient and effective operation of the Airport and increase the potential for Queenstown Airport to suffer reverse sensitivity effects. It would not be the most appropriate way to achieve the strategic objectives and policies of the PDP nor the ORPS, PORPS and NPS-UD that I have outlined earlier, nor would it enable, but could be to the detrimental to, the wider community's economic and social wellbeing.

Submissions seeking intensification in Operative Zones

139. Submissions 44, 632, 191 and 473 have been identified in the s42A Strategic Report by Ms Bowbyes as outside the scope of the variation because the submissions seek provision for intensification within operative zones that have not yet been brought into the PDP.

140. While the issue of jurisdiction scope is a legal one, I tend to agree that as a Variation to the Proposed Plan, no changes can be made to provisions of the Operative District Plan.

141. If these submissions are to be considered, I maintain that in so far as the relief sought would enable new or additional ASAN to establish within the Airport's noise boundaries where such provision is not presently made in the relevant zone, it would not adequately recognise and protect the national and regional significance of the Airport. My reasons are set out in the preceding sections.

Height increases in areas impacted by the Obstacle Limitation Surfaces Designation

142. Some submitters[50] have requested height increases for buildings within the BMUZ at Frankton North, up to 24 metres. The Obstacle Limitation Surfaces Designation for Queenstown Airport (Designation 4) is proximate to some of the land addressed by these submissions.

143. Obstacle Limitation Surfaces (**OLS**) are a Civil Aviation Authority requirement to protect the airspace around airports that can be occupied during aircraft take-off and landing. They are three dimensional surfaces that exist in the airspace above and adjacent to an airport. OLS radiate outwards from an airport's runway and can extend some distance beyond an airport's actual location. Their purpose is operational safety, including if/when aircraft are off course. The intention of the OLS Designation is to prevent objects from penetrating these critical areas.

144. Designation 4 includes Figures (maps) that depict the OLS for Queenstown Airport. From these, it appears that the OLS is around 25 metres above airport datum (i.e. in the air) over parts of the BMUZ. Enabling a 24 metre building could result in penetration of the OLS during construction (e.g., by cranes). Under Designation 4, QAC's express authorisation would be required before this could occur, however, provision for a 24m height building would likely require active, close monitoring by QAC to ensure compliance with Designation 4 is achieved at all times. Practically, constructing a 24 metre high building without penetrating the OLS may not be possible.

145. In my view, it is preferable and more appropriate to have a zone and rule framework for the BMUZ that is consistent with and does not undermine the OLS designation. I consider the existing 12m height limit, which was resolved following appeals on the PDP where the OLS designation was an issue, best achieves this.

SECTION 42A REPORTS

146. As is evident from the discussion above, my views are generally aligned with those expressed in the various section 42A reports addressing planning matters. I therefore make no further comments on these reports.

[50] Submitter #766, #768, and #775.

CONCLUSION

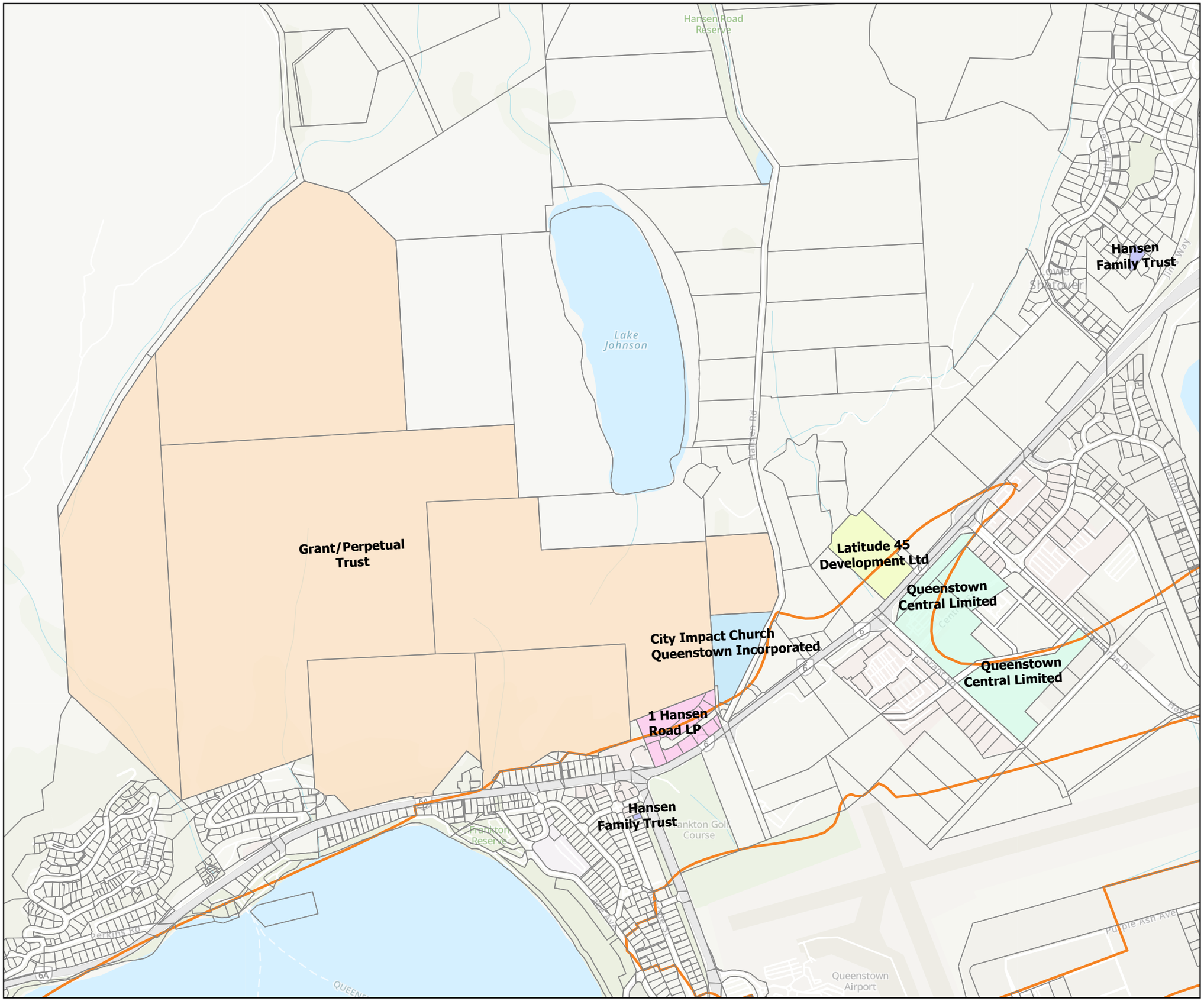
147. There is a well-documented pattern in both New Zealand and internationally where inadequate forward planning has resulted in important infrastructure—such as airports—being compromised by incompatible land use decisions. If allowed to establish in areas affected by airport operations and noise, sensitive activities can give rise to reverse sensitivity effects that can ultimately restrict the ongoing function of these vital facilities.

148. It is essential to acknowledge that infrastructure like airports are dynamic and will inevitably expand. Proactively managing land use to prevent sensitive development from encroaching into zones of operational impact is the most effective way to avoid these issues.

149. The existing planning framework of the PDP appropriately recognises and protects Queenstown Airport, recognising the Airport as a key piece of strategic infrastructure that delivers benefits at both the regional and national level. The existing framework, which limits the establishment of additional noise sensitive activities in the areas most affected by aircraft noise (the OCB and ANB), plays a critical role in protecting and supporting the Airport's long-term viability.

150. Given the thorough and considered development of the existing PDP framework it is my view that the Urban Intensification Variation should maintain this framework in full and not provide for the enablement of additional ASAN within the ANB and OCB. Any material changes to the current regime risks undermining a carefully balanced approach that has already been rigorously tested and confirmed.

Samantha Kealey
07 July 2025



LEGEND

- Outer Control Boundary
- 1 Hansen Road LP
- City Impact Church Queenstown Incorporated
- Grant/Perpetual Trust
- Hansen Family Trust
- Latitude 45 Development Ltd
- Queenstown Central Limited

SUBMITTER LANDHOLDINGS

Urban Intensification

Queenstown Airport Corporation

Source: LINZ

Date: 19/06/2025
Scale: 1:11,492 @ A3
Project: 3240-25

N

Revision: 2

TOWNPLANNING GROUP