

**IN THE ENVIRONMENT COURT  
AT CHRISTCHURCH**

**ENV-2018-CHCH-0000**

**UNDER THE** Resource Management Act 1991 ("**Act**")  
**IN THE MATTER OF** An appeal under Schedule 1, Clause 14(1), of the Act  
**BETWEEN** **CLIVE MANNERS WOOD**  
**Appellant**  
**AND** **QUEENSTOWN LAKES DISTRICT COUNCIL**  
**Respondent**

**NOTICE OF APPEAL BY CLIVE MANNERS WOOD  
AGAINST A DECISION ON A PROPOSED PLAN**

**13 JUNE 2018**

**TO:** The Registrar  
Environment Court  
PO Box 2069  
20 Lichfield Street  
**CHRISTCHURCH**  
([Christine.McKee@justice.govt.nz](mailto:Christine.McKee@justice.govt.nz))

**AND TO:** The Respondent  
([dpappeals@glde.govt.nz](mailto:dpappeals@glde.govt.nz))

**AND TO:** Relevant submitters

**Appeal**

1. I made a submission on Stage 1 of the Queenstown Lakes District Proposed District Plan ("**PDP**") on or around **22** October 2015.
2. The Queenstown Lakes District Council ("**QLDC**") made its decision on submissions and further submissions on the PDP on 7 May 2018 ("**Decision**"). The Decision was publicly notified on or around that day.
3. I appeal parts of the Decision as identified in this notice of appeal.
4. I am not a trade competitor for the purposes of Section 308D of the Act.

## Submission

5. My submission opposed the rules and standards and other provisions proposed in the PDP relating to noise. I sought that the current “status quo” provisions in the Operative Plan be maintained, including current noise restrictions.
6. In particular, I raised concerns about the approach under PDP to “informal airports”, which are designed (or have the effect of) enabling private helipads to be established without consent (or with an easy consent) – and without the ability for residents to participate in applications affecting their local environment.
7. I was, and remain, concerned about the noise pollution and effects on amenity and character which does not appear to have been given due consideration by the QLDC.
8. I was very concerned at the research paper referenced by the QLDC apparently in support of its position,<sup>1</sup> which stated: “Since the enforcement of the existing District Plan provisions that relate to informal airports by Lakes Environmental, **literally hundreds of resource consent applications for informal airports have been lodged with Lakes Environmental.**”
9. The paper went on to say, in an apparent attempt to accommodate these applications: “It is recommended that a frequency of three flights per week (for either fixed or rotary wing aircraft or a combination of both) is appropriate for informal airports in the Rural General Zone with a Permitted Activity status. This would allow for infrequent flights at wedding reception venues, wineries, and private residential/commercial landings and would cover a variety of “impromptu one off landings”. It further stated “For the purpose of this Rule the relevant noise standards of the Zone shall not apply to informal airports”.
10. The approach seems to be to allow anyone who want to have private helipads on their land to be able to do so without consent requirements or the need to comply with the noise standards that everyone else has to. Just because “hundreds” of applications have been made, does not mean that the District Plan should be changed to allow those activities and avoid due process and proper consideration of effects.

## The Decision

11. The Decision adopted the following rule for informal airports:

### 21.10.2 Informal Airports Located on other Rural Zoned Land

Informal Airports that comply with the following standards shall be permitted activities:

- 21.10.2.1 Informal airports on any site that do not exceed a frequency of use of 2 flights\* per day;
- 21.10.2.2 Informal airports for emergency landings, rescues, fire-fighting and activities ancillary to farming activities;

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<sup>1</sup> Found at <http://www.qldc.govt.nz/assets/Uploads/Informal-Airports-Research-Report.pdf>.

21.10.2.3 In relation to point Rule 21.10.2.1, the informal airport shall be located a minimum distance of 500 metres from any other zone or the notional boundary of any residential unit of building platform not located on the same site.

\* note for the purposes of this Rule a flight includes two aircraft movements i.e. an arrival and departure

12. In other words, someone could, for their own private purposes, operate a helipad with up to 1,460 movements a year without any need to consider the effects of that on their neighbours and wider environment, provided that they can locate their pad 500m from a neighbouring house or building platform. Even if they are closer than 500m, they will say that movements of that scale are anticipated by the plan.
13. There is a real risk that there will be no consideration of cumulative effects, safety effects, and no ability to prevent multiple numbers of these helipads from being developed all over the District.
14. Even if movements are fewer in practice, the Decision is likely to allow everyone who wishes to set up their own private helipads to do so, with very little supervision. Furthermore, even if consent is required, who will monitor and supervise the ongoing use of all of these helipads, particularly if greater use is made of them than is supposed to?
15. I also understand that the Decision in Rule 36.5.10 requires that: "Sound from any helicopter landing area must be measured and assessed in accordance with NZ 6807:1994 Noise Management and Land Use Planning for Helicopter Landing Areas." I understand that this allows an "averaging" of helicopter noise over 24 hours. At a busy airport, that makes some sense, but for private helipads where there are a limited number of movements a day (whether at the proposed permitted level or somewhat above that), the NZ 6807 standard essentially "masks" the true effects in terms of disturbance, and allows impacts on character and amenity without proper consideration.
16. The Council refused to consider my submission on this issue as part of its Chapter 36 process, as it did not consider my submission "relevant to Chapter 36". Quite clearly, given that I sought the current "status quo" noise restrictions to apply, that is wrong.

#### **Scope of appeal**

17. My appeal relates to all of the provisions in the PDP relating to informal airports, including the noise provisions, ie objectives, policies, rules and explanations and other text relevant to those issues.

#### **Reasons for the appeal**

18. The Decision as it relates to informal airports, and in particular its enablement of helipads:
  - (a) fails to promote sustainable management of resources, including the enabling of people and communities to provide for their social well-being, and will not avoid, remedy or mitigate the adverse effects of helipads on the environment, and so will not achieve the section 5 purpose of the Act;

- (b) fails to maintain and enhance amenity values, a matter to have particular regard to under section 7(c) of the Act;
- (c) fails to achieve the functions of the Council under section 31, including the integrated management of the effects of the use and development of land and physical resources;
- (d) fails to meet the requirements of section 32;
- (e) fails to recognise the need for resource consent to be required for anything other than occasional helicopter landings, so that effects on neighbours and wider amenity and character can be considered;
- (f) fails to consider the “masking” or “minimising” effects of the 24 hour averaging approach proposed for the measurement of helicopter noise;
- (g) fails to consider the cumulative effects the development of multiple helipads under the permitted standards proposed;
- (h) fails to consider the “permitted baseline” or “existing environment” implications of the permitted standards proposed;
- (i) fails to consider the “existing environment” comprising the already consented helipads in the rural and areas (noting that the Council had “literally hundreds” of applications for those activities), and the cumulative effects of allowing further helipads against that environment under the proposed PDP regime; and
- (j) fails to achieve or implement the relevant district-wide objectives and policies of the PDP, including:
  - (i) Policy 21.2.11.1: Ensure informal airports are located, operated and managed so as to maintain the surrounding rural amenity; and
  - (ii) Policy 21.2.11.2: Protect rural amenity values, and amenity of other zones from the adverse effects that can arise from informal airports; and
- (k) is being used inappropriately to justify the application of the same rules and standards in the Wakatipu Basin (Chapter 24) (before this and other appeals will be resolved); and
- (l) otherwise fails to address the concerns stated in my submission and appeal above.

**Relief sought**

19. I seek:

- (a) Retention of all the provisions in the Operative Plan relating to the establishment and assessment of helipads (or “informal airports”).
- (b) In particular:

- (i) require all but infrequent landings of helicopters to require consent;
- (ii) apply the current noise standards, rather than the 24 hour averaging approach; and
- (c) any other similar, consequential, or other relief as is necessary to address the issues raised in my original submission and/or this appeal.
- (d) Costs.

**Alternative dispute resolution**

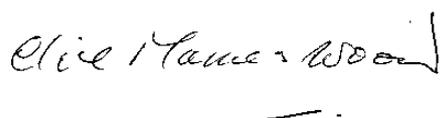
20. I agree to participate in mediation or other alternative dispute resolution of the proceeding.

**Attachments**

21. I attach the following documents to this notice.

- (a) a copy of my submission;
- (b) a copy of the relevant parts of the Decision being:
  - (i) extracts from Chapter 21 and 22 recommendation report;
  - (ii) extracts from the Chapter 36 recommendation report; and
- (c) a list of names and addresses of persons to be served with a copy of this notice, being every person who made a further submission on my submission.

**DATED** 13 June 2018



**CLIVE MANNERS WOOD**

My address for service is 101 Malaghans Road. RD1 Queenstown 9371.

I may also be emailed on [clive@blo.co.nz](mailto:clive@blo.co.nz).

## **Advice to recipients of copy of notice of appeal**

### *How to become party to proceedings*

You may be a party to the appeal if you made a submission on the matter of this appeal.

To become a party to the appeal, you must,—

(a) within 15 working days after the period for lodging a notice of appeal ends, lodge a notice of your wish to be a party to the proceedings (in [form 33](#)) with the Environment Court and serve copies of your notice on the relevant local authority and the appellant; and

(b) within 20 working days after the period for lodging a notice of appeal ends, serve copies of your notice on all other parties.

If you are a trade competitor of a party to the proceedings, your right to be a party to the proceedings in the court may be limited (see [section 274\(1\)](#) and [Part 11A](#) of the Resource Management Act 1991).

You may apply to the Environment Court under [section 281](#) of the Resource Management Act 1991 for a waiver of the above timing requirements (see [form 38](#)).

### *Advice*

If you have any questions about this notice, contact the Environment Court in Auckland, Wellington, or Christchurch.

**Attachment 1 - a copy of my submission**

**Submitter Details**

First Name: **Clive**  
 Last Name: **Manners Wood**  
 Street: **101 Malaghans Road**  
 Suburb: **RD 1**  
 City: **Queenstown**  
 Country: **New Zealand**  
 PostCode: **9371**  
 Daytime Phone: **03 441 1500**  
 eMail: **cmwood@xtra.co.nz**

Trade competition and adverse effects:

I could  I could not

gain an advantage in trade competition through this submission

I am  I am not

directly affected by an effect of the subject matter of the submission that :

a. adversely affects the environment, and

b. does not relate to the trade competition or the effects of trade competitions.

Wishes to be heard:

Yes

No

Preferred hearing location:

- |   |   |  |   |
|---|---|--|---|
| <input type="checkbox"/> Ch 1 -<br>Introduction                     | <input type="checkbox"/> Ch 2 - Definitions   | <input type="checkbox"/> Ch 3 - Strategic<br>Direction                       | <input type="checkbox"/> Ch 4 - Urban<br>Development                                |
| <input type="checkbox"/> Ch 5 - Tangata<br>Whenua                   | <input type="checkbox"/> Ch 6 - Landscape   | <input type="checkbox"/> Ch 7 - Low<br>Density Residential                   | <input type="checkbox"/> Ch 8 - Medium Density<br>Residential                       |
| <input type="checkbox"/> Ch 9 - High<br>Density<br>Residential      | <input type="checkbox"/> Ch 10 - Arrowtown<br>Residential Historic<br>Management Zone | <input type="checkbox"/> Ch 11 - Large Lot<br>Residential                    | <input type="checkbox"/> Ch 12 - Queenstown<br>Town Centre                          |
| <input type="checkbox"/> Ch 13 - Wanaka<br>Town Centre              | <input type="checkbox"/> Ch 14 - Arrowtown Town<br>Centre                             | <input type="checkbox"/> Ch 15 - Local<br>Shopping Centres                   | <input type="checkbox"/> Ch 16 - Business<br>Mixed Use Zone                         |
| <input type="checkbox"/> Ch 17 -<br>Queenstown<br>Airport Mixed Use | <input checked="" type="checkbox"/> Ch 21 - Rural Zone                                | <input type="checkbox"/> Ch 22 - Rural<br>Residential and<br>Rural Lifestyle | <input type="checkbox"/> Ch 23 - Gibbston<br>Character Zone                         |
| <input type="checkbox"/> Ch 26 - Historic<br>Heritage               | <input type="checkbox"/> Ch 27 - Subdivision and<br>Development                       | <input type="checkbox"/> Ch 28 - Natural<br>Hazards                          | <input type="checkbox"/> Ch 30 - Energy and<br>Utilities                            |
| <input type="checkbox"/> Ch 32 -<br>Protected Trees                 | <input type="checkbox"/> Ch 33 - Indigenous<br>Vegetation and<br>Biodiversity         | <input type="checkbox"/> Ch 34 - Wilding<br>Exotic Trees                     | <input type="checkbox"/> Ch 35 - Temporary<br>Activities and Relocated<br>Buildings |
| <input checked="" type="checkbox"/> Ch 36 - Noise                   | <input type="checkbox"/> Ch 37 - Designations   | <input type="checkbox"/> Ch 41 - Jacks<br>Point Zone                         | <input type="checkbox"/> Ch 42 - Waterfall Park                                     |
| <input type="checkbox"/> Ch 43 -<br>Millbrook Resort<br>Zone        |   |  |   |

## Submission

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### Consultation Document Submissions

Part Four - Rural Environment > 21Rural Zone > 21.5Rules - Standards > Table 6

- Support
- Oppose
- Other - Please clearly indicate your position in your submission below

#### I seek the following decision

The current status quo has to be maintained. Including the current noise restrictions.

#### My submission is

"Informal" Airports are simply to enable helipads to be established without consent. Nearby residents will no longer have a say on their local environment. The QLDC research paper <http://www.qldc.govt.nz/assets/Uploads/Informal-Airports-Research-Report.pdf> says: "Since the enforcement of the existing District Plan provisions that relate to informal airports by Lakes Environmental, literally hundreds of resource consent applications for informal airports have been lodged with Lakes Environmental. It is recommended that a frequency of three flights per week (for either fixed or rotary wing aircraft or a combination of both) is appropriate for informal airports in the Rural General Zone with a Permitted Activity status. This would allow for infrequent flights at wedding reception venues, wineries, and private residential/commercial landings and would cover a variety of "impromptu one off landings". • ?? For the purpose of this Rule the relevant noise standards of the Zone shall not apply to informal airports. ' The acoustic consultant quoted in the research paper also said that 11,000 helicopter landings per year at the Skyline would be less than minor. It is the duty of everyone to at least maintain the environmental amenity of the Rural Zone. Any ongoing activity that does not comply with zone rules should have a consent. "Informal Airports" will increase noise pollution. Which unfortunately has not been considered by the QLDC.

#### Attached Documents

File
No records to display.

**Attachment 2 - a copy of the relevant parts of the Decision**

# QUEENSTOWN LAKES DISTRICT COUNCIL

Hearing of Submissions on Proposed District Plan

Report 4A

Report and Recommendations of Independent Commissioners Regarding  
Chapter 21, Chapter 22, Chapter 23, Chapter 33 and Chapter 34

## Commissioners

Denis Nugent (Chair)

Brad Coombs

Mark St Clair

#### 4.35 Objective 21.2.11

365. As notified, Objective 21.2.11 read as follows;

*Manage the location, scale and intensity of informal airports.*

366. Submissions on this objective provided conditional support subject to other relief sought to policies and rules, including location and frequency controls<sup>425</sup>, or sought amendments to provide for new informal airports and protect existing informal airports from incompatible land uses.<sup>426</sup> One submission also sought clarification in relation to its application to commercial ballooning in the district.<sup>427</sup>
367. In the Section 42A Report, Mr Barr expressed the view that the definition of aircraft included hot air balloons and therefore a site on which a balloon lands or launches from is an informal airport.<sup>428</sup>
368. Mr Barr did not recommend any amendments to the objective and associated policies for informal airports in the Section 42A Report. Rather, Mr Barr addressed details of the permitted activity standards governing setbacks, frequency of flights, standards for Department of Conservation operational activities and other matters.<sup>429</sup>
369. In the Council's memorandum on revising the objectives to be more outcome focused<sup>430</sup>, Mr Barr recommended rewording of the objective as follows;

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<sup>425</sup> Submissions 571, 723, 730, 732, 734, 736, 738, 739, 760, 843

<sup>426</sup> Submission 607

<sup>427</sup> Submission 217

<sup>428</sup> C Barr, Section 42 Report, Page 76, Para 16.36

<sup>429</sup> C Barr, Section 42 Report, Pages 69 - 78

<sup>430</sup> Council Memoranda dated 13 April 2016

*The location, scale and intensity of informal airports is managed.*

370. Mr Dent, in evidence for Totally Tourism<sup>431</sup>, considered that the objective was poorly worded and should be amended to indicate that informal airports are desired within the Rural Zone, but should be subject to their effects on amenity being managed.<sup>432</sup> Mr Dent recommended the objective be reworded as follows;

*The operation of informal airports in the Rural Zone is enabled subject to the management of their location, scale and intensity.*

371. Mr Farrell in evidence for Te Anau Developments<sup>433</sup>, supported the submitter's request for new informal airports to be "provided for" in the objective protection of existing informal airports from incompatible land uses. Mr Farrell expressed the view that existing "... informal airports face operational risks from potential reverse sensitivity effects associated with noise sensitive activities, which is an operational risk, and could result in unnecessary costs, to tourism operators."<sup>434</sup>

372. In reply, Mr Barr, agreed and accepted the intent of Mr Dent's recommended amendment to the objective<sup>435</sup>. Mr Barr also agreed with Mr Farrell that a policy protecting existing informal airports from incompatible land uses was warranted, but not at expense of a policy that protects amenity from airports<sup>436</sup>. Mr Barr recommended alternative wording for the objective and set out a brief section 32AA analysis<sup>437</sup>.

373. An objective that sets out that something is to be managed, but does not specify to what purpose or end result, does not take one very far. We agree with Mr Dent that it is the effects of informal airports that should be managed, but consider that his suggestion of 'enabling' goes too far. We found Mr Farrell's reasoning as to operational risks a little difficult to follow and the amended wording of the objective he supported unsatisfactory because it failed to address amenity effects. In conclusion, we prefer Mr Barr's reply version, which did address our concerns as to purpose, as being the most appropriate in terms of the alternatives available to us and in achieving the purposes of the Act.

374. Accordingly, we recommend that the wording of Objective 21.2.11 should be as follows:

*The location, scale and intensity of informal airports is managed to maintain amenity values while protecting informal airports from incompatible land uses.*

#### **4.36 Policy 21.2.11.1**

375. Policy 21.2.11.1 as notified read as follows:

*Recognise that informal airports are an appropriate activity within the rural environment, provided the informal airport is located, operated and managed so as to minimise adverse effects on the surrounding rural amenity.*

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<sup>431</sup> Submission 571

<sup>432</sup> S Dent, Evidence, Page 4, Paras 17 - 18

<sup>433</sup> Submission 607

<sup>434</sup> C Barr, Evidence, Page 24, Para 110

<sup>435</sup> C Barr, Reply, Page 28, Para 9.19

<sup>436</sup> C Barr, Reply, Page 27, Para 9.14

<sup>437</sup> C Barr, Reply, Page 5, Appendix 2

376. Submissions on this policy ranged from conditional support subject to other relief sought to policies and rules including location and frequency controls<sup>438</sup>; or sought amendment to the words after ‘managed’ to insert ‘in accordance with CAA regulations’<sup>439</sup>; amendment to replace ‘minimise’ with ‘avoid, remedy mitigate’ and limit to existing rural amenity values<sup>440</sup>; amendment to apply to existing informal airports and to protect them from surrounding rural amenity<sup>441</sup>; and finally amendment to include reference to flight path locations of fixed wing aircraft and their protection from surrounding rural amenity.<sup>442</sup>
377. As noted above, Mr Barr did not recommend any amendments to the policies for informal airports in the Section 42A Report.
378. Ms Macdonald, counsel for Skydive Queenstown Limited<sup>443</sup>, suggested an amendment to the relief sought by the submitter, recognising that a function of a territorial authority was management of the effects of land use and that objectives, policies and rules could be prepared to that end. The amended relief was as follows:
- Recognise that informal airports are an appropriate activity within the rural environment, provided the informal airport is located, operated and managed so as to minimise adverse effects on the surrounding rural amenity, and in accordance with Civil Aviation Act requirements.*<sup>444</sup>
379. Mr Farrell’s evidence for Te Anau Developments supporting the submitter’s requested change was based on the same reasoning as we set out in relation to Objective 21.2.11 above.
380. Mr Dent in evidence for Totally Tourism considered that the policies (21.2.11.1 and 21.2.11.2) did not provide a credible course of action to implement the objective and set out recommended rewording.<sup>445</sup>
381. Mr Barr, in reply concurred with Mr Dent, and recommended similar changes to those proposed by Mr Dent.<sup>446</sup>
382. As noted in the reasons for the submission from Skydive Queenstown Limited, a territorial authority has no particular expertise in CAA matters. We therefore find that it is not effective and efficient for the policy to include requirements of CAA regulations that are for the CAA to administer.
383. On Mr Farrell’s evidence in support of the relief sought by Te Anau Developments we reach a similar finding as for Objective 21.2.11 above. We also find that the protection of informal airports from incompatible uses could potentially be a separate policy and we address that matter in detail below. For present purposes, we find that that that issue should not be

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<sup>438</sup> Submissions 723, 730, 732, 734, 736, 738, 739, 760, 843

<sup>439</sup> Submission 122

<sup>440</sup> Submission 607

<sup>441</sup> Submission 385

<sup>442</sup> Submissions 285, 288

<sup>443</sup> Submission 122

<sup>444</sup> J Macdonald, Legal Submissions, Page 3, Para 5

<sup>445</sup> S Dent, Evidence, Pages 4-5, Paras 19 - 20

<sup>446</sup> C Barr, Reply, Page 29, 9.20

referenced in this policy. Similarly we think that the wording recommend by Mr Barr is effective and efficient in its alignment with the objective.

384. Accordingly we recommend that Policy 21.2.11.1 be reworded as follows;

*Ensure informal airports are located, operated and managed so as to maintain the surrounding rural amenity.*

#### **4.37 Policy 21.2.11.2**

385. Policy 21.2.11.2 as notified read as follows:

*Protect rural amenity values, and amenity of other zones from the adverse effects that can arise from informal airports.*

386. Submissions on this policy ranged from conditional support subject to other relief sought to policies and rules including location and frequency controls<sup>447</sup> or sought amendment to protect informal airports and flight path locations of fixed wing aircraft from surrounding rural amenity<sup>448</sup>.

387. As we have already noted, Mr Barr did not recommend any amendments to the policies for informal airports in the Section 42A Report.

388. Similarly we addressed the evidence of Mr Farrell and Mr Dent, as well as Mr Barr's response in reply, under Policy 21.2.11.1 above. Again, we think that protection of informal airports should be addressed separately. Taking account of our recommended amendment to Policy 21.2.11.1, we find that a policy to address the adverse effects in non-rural zones from informal airports is required. Otherwise a policy gap would be remain.

389. Accordingly, we find that Policy 21.2.11.2 should remain as notified.

#### **4.38 Additional Policy – Informal Airports**

390. We observed above that there appeared to be a case to protect informal airports from incompatible activities. Considering the issues identified to us by a number of recreational pilots at the hearing and the evidence of Mr Dent, Mr Farrell and Mr Barr, we agree that a policy addressing that matter is appropriate in achieving the stated objective. Mr Barr, in reply, proposed the following wording of such an additional policy as follows;

*21.2.11.3 Protect legally established and permitted informal airports from the establishment of incompatible activities.<sup>449</sup>*

391. In reaching this view, Mr Barr did not recommend that the new policy flow through to a new rule to the same effect, given the administrative difficulties in identifying existing informal airport locations and noting that Objective 21.2.4 and associated policies already sought to protect permitted and legally established activities.<sup>450</sup> We tested the potential identification of informal airports with some of the recreational pilots at the hearings<sup>451</sup> and reached the conclusion that such a method would not be efficient. Mr Barr's proposed new policy refers to

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<sup>447</sup> Submissions 723, 730, 732, 734, 736, 738, 739, 760, 843

<sup>448</sup> Submission 285, 288, 385, 607

<sup>449</sup> C Barr, Reply, Appendix 1

<sup>450</sup> C Barr, Reply, Pages 27-28, Paras 9.14 – 9.15

<sup>451</sup> Mr Tapper and Mr Carlton

*"legally established"* informal airports. To our mind, consistent with the wording in the Act, we think that *"lawfully established"* is more correct.

392. We also consider that some qualification of reference to permitted informal airports is required. While Mr Barr is correct that Objective 21.2.4 and the related policies provide for permitted activities these are "anticipated" permitted activities. It would not be efficient to constrain land uses on the basis that they are incompatible with informal airports at all locations where the airports would meet the permitted activity standards. We also consider that it should only be the establishment incompatible activities in the immediate vicinity that the policy addresses.

393. We therefore recommend the inclusion of a new policy (21.2.11.3) worded as follows;

*Protect lawfully established and anticipated permitted informal airports from the establishment of incompatible activities in the immediate vicinity.*

#### **4.39 New Objective and Policies – Informal Airports**

394. Two submissions sought objectives and policies to *"enable the assessment of proposals that exceed the occasional /infrequent limitations"*<sup>452</sup>. The submission reasons identified that this relief was sought as the Plan is *"silent on how applications to exceed Standards 21.5.26.1 and 21.5.26.2 will be assessed and considered"*.

395. We did not receive specific evidence on this matter. No specific wording of the objectives or policies were put before us. In the absence of evidence providing and/or justifying such objectives and policies, we recommend that these submissions be rejected.

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452 Submissions 660, 662

453 Submission 356, 600, 758

454 Submission 339, 706

455 Submission 307

456 Submission 621

457 Submission 766

**6.23 Rule 21.4.25 – Informal Airports**

675. As notified, Rule 21.4.25, provided for:

*“Informal airports that comply with Table 6.”*

as a permitted activity.

676. The submissions on this rule are linked to the Rules 21.5.25 and 21.5.26, being the standards applying to informal airports. It is appropriate to deal with those two rules at the same time as considering Rule 21.4.25.

677. As notified, the standards for informal airport Rules 21.5.25 and 21.5.26 (Table 6) read as follows;

	<b>Table 6 - Standards for Informal Airports</b>	<b>Non-Compliance</b>
21.5.25	<p><b>Informal Airports Located on Public Conservation and Crown Pastoral Land</b></p> <p>Informal airports that comply with the following standards shall be permitted activities:</p> <p>21.5.25.1 Informal airports located on Public Conservation Land where the operator of the aircraft is operating in accordance with a Concession issued pursuant to Section 17 of the Conservation Act 1987;</p> <p>21.5.25.2 Informal airports located on Crown Pastoral Land where the operator of the aircraft is operating in accordance with a Recreation Permit issued pursuant to Section 66A of the Land Act 1948;</p> <p>21.5.25.3 Informal airports for emergency landings, rescues, fire-fighting and activities ancillary to farming activities;</p> <p>21.5.25.4 In relation to points (21.5.25.1) and (21.5.25.2), the informal airport shall be located a minimum</p>	D

	<b>Table 6 - Standards for Informal Airports</b>	<b>Non-Compliance</b>
	distance of 500 metres from any formed legal road or the notional boundary of any residential unit or approved building platform not located on the same site.	
21.5.26	<p><b>Informal Airports Located on other Rural Zoned Land</b></p> <p>Informal Airports that comply with the following standards shall be permitted activities:</p> <p>21.5.26.1 Informal airports on any site that do not exceed a frequency of use of 3 flights* per week;</p> <p>21.5.26.2 Informal airports for emergency landings, rescues, fire-fighting and activities ancillary to farming activities;</p> <p>21.5.26.3 In relation to point (21.5.26.1), the informal airport shall be located a minimum distance of 500 metres from any formed legal road or the notional boundary of any residential unit of building platform not located on the same site.</p> <p>* note for the purposes of this Rule a flight includes two aircraft movements i.e. an arrival and departure.</p>	D

678. There were eleven submissions that sought that Rule 21.4.25 be retained<sup>654</sup>, and six submissions that sought it be deleted<sup>655</sup> for various reasons including seeking the retention of ODP rules.

679. For Rule 21.5.25, submissions variously ranged from:

- Retain as notified<sup>656</sup>
- Delete provision<sup>657</sup>
- Delete or amend (reduce) set back distances in 21.5.25.4
- Amend permitted activities list 21.5.25.3 to include operational requirements of Department of Conservation<sup>658</sup>

680. For Rule 21.5.26, submissions variously ranged from:

- Retain as notified<sup>659</sup>
- Delete provision<sup>660</sup>
- Delete or amend (increase) number of flights in 21.5.26.1<sup>661</sup>
- Delete or amend (reduce) set back distances in 21.5.26.3<sup>662</sup>
- Amend permitted activities list 21.5.26.2 to only to emergency and farming<sup>663</sup>, or amend to include private fixed wing operations and flight currency requirements<sup>664</sup>

<sup>654</sup> Submissions 563, 573, 608, 723, 730, 732, 734, 736, 738, 739, 760, 843

<sup>655</sup> Submission 109, 143, 209, 213, 500, 833

<sup>656</sup> Submissions 315, 571, 713

<sup>657</sup> Submissions 105, 135, 162, 211, 500, 385

<sup>658</sup> Submission 373

<sup>659</sup> Submissions 571, 600

<sup>660</sup> Submissions 93, 105, 162, 209, 211, 385, 883

<sup>661</sup> Submissions 122, 138, 221, 224, 265, 405, 423, 660, 662

<sup>662</sup> Submissions 106, 137, 138, 174, 221, 265, 382, 405, 423, 660, 723, 730, 732, 734, 736, 738, 739, 760, 784, 843

<sup>663</sup> Submission 9

<sup>664</sup> Submission 373

- f. Amend 21.5.26.1 to read as follows “Informal Airports where sound levels do not exceed limits prescribed in Rule 36.5.14”.
681. In the Section 42A Report, Mr Barr recorded that the change from the system under the ODP where all informal airports required resource consents, to permitted activity status under the PDP was motivated in part by a desire to reduce the duplication of authorisations that were already required from the Department of Conservation or Commissioner of Lands and that details were set out in the Section 32 Report.<sup>665</sup> Mr Barr also recorded that noise standards were not part of this Chapter, but were rather considered under the Hearing Stream 5 (District Wide Provisions).<sup>666</sup>
682. Our understanding of the combined rules was assisted by the evidence of Dr Chiles. He explained the difficulty in comprehensively quantifying the noise effects from infrequently used airports. We understood that the two New Zealand Standards for airport noise (NZ6805 and NZS6807) required averaging of aircraft sound levels over periods of time that would not adequately represent noise effects from sporadic aircraft movements that are usually associated with informal airports.
683. Dr Chiles explained that the separation distance of 500m required by Rules 21.5.25.4 and 21.5.26.3 should result in compliance with a 50 DB L<sub>dn</sub> criterion for common helicopter flights unless there were more than approximately 10 flights per day.<sup>667</sup> Dr Chiles was also satisfied that for fixed wing aircraft, at 500m to the side of the runway there would be compliance with 55 dB L<sub>dn</sub> and 95 dB L<sub>AE</sub> for up to 10 flights per day. However, he noted, compliance off the end of the runway may not be achieved until approximately 1 kilometre away.<sup>668</sup>
684. For those occasions where compliance with the noise criteria referred to above could not be achieved, Dr Chiles concluded that the relevant rules in Chapter 36 (recommended Rules 36.5.10 and 36.5.11) would apply. As we understood his evidence, the purpose of the informal airport rules in this zone are to provide a level of usage as a permitted activity that could be expected to comply with the rules in Chapter 36, but compliance would be expected nonetheless.
685. Mr Barr reviewed all the evidence provided in his Reply Statement and recommended amendments to the rules:
- a. providing for Department of Conservation operations on Conservation or Crown Pastoral Land;
  - b. requiring 500m separation from zone boundaries, but not road boundaries; and
  - c. providing for informal airports on land other than Conservation or Crown Pastoral Land to have up to 2 flights per day (instead of 3 per week).
686. We agree that the provision of some level of permitted informal activity in the Rural Zone is appropriate, as opposed to the ODP regime where all informal airports require consent. While we heard from submitters who considered more activity should be allowed as of right, and others who considered no activity should be allowed, we consider Mr Barr and Dr Chiles have proposed a regime that will facilitate the use of rural land by aircraft while protecting rural amenity values. Consequently, we recommend that Rule 21.4.25 be renumbered and amended

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<sup>665</sup> C Barr, Section 42A Report, Page 71, Paras 16.6 – 16.7

<sup>666</sup> C Barr, Section 42A Report, Pages 70 – 71, Paras 16.3 – 16.4

<sup>667</sup> Dr S Chiles, EIC, paragraph 5.1

<sup>668</sup> *ibid*, paragraph 5.2

to refer to the standards in Table 7, and that Rules 21.5.25 and 21.5.26 be renumbered and revised to read:

	<b>Table 7 - Standards for Informal Airports</b>	<b>Non-Compliance</b>
21.10.1	<p><b>Informal Airports Located on Public Conservation and Crown Pastoral Land</b></p> <p>Informal airports that comply with the following standards shall be permitted activities:</p> <p>21.10.1.1 Informal airports located on Public Conservation Land where the operator of the aircraft is operating in accordance with a Concession issued pursuant to Section 17 of the Conservation Act 1987;</p> <p>21.10.1.2 Informal airports located on Crown Pastoral Land where the operator of the aircraft is operating in accordance with a Recreation Permit issued pursuant to Section 66A of the Land Act 1948;</p> <p>21.10.1.3 Informal airports for emergency landings, rescues, fire-fighting and activities ancillary to farming activities, or the Department of Conservation or its agents;</p> <p>21.10.1.4 In relation to Rules 21.10.1.1 and 21.10.1.2, the informal airport shall be located a minimum distance of 500 metres from any other zone or the notional boundary of any residential unit or approved building platform not located on the same site.</p>	D
21.10.2	<p><b>Informal Airports Located on other Rural Zoned Land</b></p> <p>Informal Airports that comply with the following standards shall be permitted activities:</p> <p>21.10.2.1 Informal airports on any site that do not exceed a frequency of use of 2 flights* per day;</p> <p>21.10.2.2 Informal airports for emergency landings, rescues, fire-fighting and activities ancillary to farming activities;</p> <p>21.10.2.3 In relation to rule 21.10.2.1, the informal airport shall be located a minimum distance of 500 metres from any other zone or the notional boundary of any residential unit of building platform not located on the same site.</p> <p>* note for the purposes of this Rule a flight includes two aircraft movements i.e. an arrival and departure.</p>	D

## 27.12 Rules 22.4.13 and 22.4.14

1157. As notified, Rule 22.4.13 provided for informal airports to be a discretionary activity, and Rule 22.4.14 provided for informal airports for emergency landings, rescues, fire-fighting and activities ancillary to farming as permitted activities.
1158. Two submissions<sup>1028</sup> sought that informal airports under Rule 22.4.13 be a prohibited activity, one<sup>1029</sup> sought that they be a non-complying activity, and one submission<sup>1030</sup> sought that strong assessment standards be applied under both rules.
1159. Mr Barr considered discretionary activity status under Rule 22.4.13 appropriate as informal airports could be acceptable depending upon the location, scale and intensity of the activity<sup>1031</sup>. Mr Vivian, in evidence presented on behalf of J and R Hadley, disagreed with Mr Barr's assessment in respect of the Rural Residential Zone. It was Mr Vivian's opinion that anticipated size of allotments in the Rural Residential Zone (4,000m<sup>2</sup>) meant that informal airports would have a significant potential to affect character and amenity due to noise and privacy effects<sup>1032</sup>.
1160. We note that in the Rural Zone informal airports are permitted subject to standards that require them to be located a minimum distance of 500 metres from any other zone or the notional boundary of any residential unit or building platform not located on the same site. As we have discussed earlier in this report when considering informal airports in the Rural Zone, this limitation combined with the low frequency of flights, is designed to ensure the noise impact of such airports was acceptable on adjacent sites. We would not expect a lesser standard to be applied in these zones.
1161. In our view, Mr Vivian was correct to point out the relatively small site sizes of sites in the Rural Residential Zone. We doubt the practicality of informal airports complying with setbacks similar to those applied in the Rural Zone in the Rural Residential Zone. We do not have the same concern with the Rural Lifestyle Zone. Consequently, we recommend that the discretionary activity for informal airports only apply to the Rural Lifestyle Zone.
1162. There was no evidence in relation to Rule 22.4.14. We agree that it is appropriate that the exceptional circumstances provided for in this rule be allowed as permitted activities. We do, however, consider the rule should be moved up the table to sit with other permitted activities making it Rule 22.4.8.
1163. We also consider that Rule 22.4.13 should exclude those informal airports permitted by Rule 22.4.8. Therefore, we recommend that Rule 22.4.13 be renumbered and reworded to read:

*Informal airports in the Rural Lifestyle Zone, except as provided for by Rule 22.4.8.*

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<sup>1028</sup> Submissions 243 (opposed by FS1224) and 811 (opposed by FS1150, FS1224, FS1325)

<sup>1029</sup> Submission 126

<sup>1030</sup> Submission 674, supported by FS1050, FS1082, FS1089, FS1146

<sup>1031</sup> C Barr, Section 42A Report, paragraph 10.1

<sup>1032</sup> C Vivian, EIC, paragraphs 9.36 to 9.39

# QUEENSTOWN LAKES DISTRICT COUNCIL

Hearing of Submissions on Proposed District Plan

Report 8

Report and Recommendations of Independent Commissioners Regarding  
Chapter 30, Chapter 35 and Chapter 36

Commissioners

Denis Nugent (Chair)

Calum MacLeod

Mark St Clair

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1.4. **Procedural Steps and Issues**

10. The hearing of Stream 5 proceeded on the basis of the pre-hearing general directions made in the Panel's Minutes summarised in Report 1<sup>22</sup>.
11. Specific to the Stream 5 hearing, Counsel for Lake Hayes Cellar Limited (LHC)<sup>23</sup> lodged a Memorandum dated 23 August 2016 seeking clarification as to whether the submissions points of LHC on Chapter 36 would be heard or deferred consistent with the Chair's Minute of 17 June 2016. By way of a Minute dated 24 August 2016, the Chair confirmed the deferment of LHC's submission to the mapping hearings.
12. The Chair issued a Minute on 26 August 2016 confirming that the submissions lodged by Mr Manners-Wood<sup>24</sup> were not relevant to Chapter 36 and, consequently, that he would not be heard in Stream 5.
13. By way of a Memorandum dated 30 August 2016, counsel for the Council sought that one full day be allocated for the Council opening on 12 September 2016. Provision was duly made for the Council to have that amount of hearing time.

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13 Submission 179 and Further Submission 1208  
14 Submission 191 and Further Submission 1253  
15 Submission 781 and Further Submission 1106  
16 Submission 571  
17 Submission 574  
18 Submission 805  
19 Submission 251 and Further Submission 1259  
20 Submission 600 and Further Submission 1132  
21 Submission 1365  
22 Report 1, Section 1.5  
23 Submission 767  
24 Submissions 213 and 220

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17.7. **Rule 36.5.13**

644. This rule set the standard for noise from helicopters. Three submitters<sup>444</sup> supported this rule.

Other submissions sought:

- a. Delete the rule<sup>445</sup>;
- b. Measure  $L_{\max}$  rather than  $L_{dn}$ <sup>446</sup>;
- c. Delete the  $L_{dn}$  measurement<sup>447</sup>;
- d. Make non-compliance a discretionary activity<sup>448</sup>.

645. In addition, one submission sought the introduction of a separate rule for helicopters landing near the top of Skyline Access Road<sup>449</sup>.

646. It was Dr Chiles' evidence<sup>450</sup> that the adverse effects of helicopters are related to both the sound level of individual helicopter movements, and also the frequency of movements. He noted that while there were some limitations with the use of an  $L_{dn}$  noise limit, it would control both factors. On the other hand, while a  $L_{AF\max}$  noise level would control the sound level, it would not control the number of movements. He also noted that there can be difficulty in obtaining reliable assessments of helicopter noise using the  $L_{AF\max}$  limit.

647. Dr Chiles also explained why he considered the  $L_{dn}$  control for helicopter noise in this rule, coupled with the additional controls on movement numbers in the Rural Zone, sets an appropriate noise limit to manage adverse noise effects. While he agreed that there was

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<sup>442</sup> Submission 649

<sup>443</sup> EiC, Section 12

<sup>444</sup> Submissions 143 (opposed by FS1093), 433 (opposed by FS1097, FS1117) and 571

<sup>445</sup> Submission 475, opposed by FS1245

<sup>446</sup> Submissions 607, 626, 660, 713

<sup>447</sup> Submission 243, opposed by FS1224, FS1245

<sup>448</sup> Submission 607

<sup>449</sup> Submission 574, opposed by FS1063

<sup>450</sup> EiC, Section 13

justification for applying the noise limits recommended for commercial areas by NZS6807 to commercial areas in the PDP, as sought in Submission 574, he considered that limit not to be appropriate in the area specified in that submission. He advised us that a recent Environment Court decision<sup>451</sup> found that the commercial area noise limit from NZ6807 was not appropriate in that location. He advised us that in considering that application, the Court found that a helicopter noise limit of 60 dB L<sub>dn</sub> in conjunction with a limit of four helicopter flights a day to be appropriate. He was unaware of justification to insert specific and different noise limits for this location into the PDP.

648. Mr Dent appeared in support of Submission 574. It was his opinion that NZ6807 was the appropriate standard for measuring helicopter noise. He explained that the ODP rules effectively have no applicable noise rules for helicopters. Turning to the specific issue of the Skyline helicopter pad, he considered there was value in making provision for a helicopter pad to locate in the vicinity of Bobs Peak with a noise limit of 60 dB L<sub>dn</sub> (less than the 65 dB L<sub>dn</sub> sought in the submission).
649. In response to this evidence, Ms Evans proffered the opinion that if the Council were to include specific controls for a specific consented activity, the PDP would be littered with such special provisions. She also advised that the Environment Court only granted consent for 5 years, to enable review, whereas if it became a rule in the PDP then it would not be subject to review until the PDP were reviewed, and would, potentially, be there for the life of the activity<sup>452</sup>.
650. There are three issues for us to deal with in regard to this rule:
- a. Whether helicopter noise limits be set using NZS6807 or in the same manner as other noise is generally controlled in the District;
  - b. The activity status of a resource consent for non-compliance; and
  - c. Whether special provision should be made for helicopter landing at Skyline.
651. All the expert evidence we heard advised us that NZS6807 is the appropriate standard to use of the assessment and control of helicopter noise. As that standard is specifically designed to deal with helicopter noise, that is unsurprising. Mr Dent assisted us by setting out a number of local consent hearings where the hearing commissioners had agreed with expert noise evidence that concluded the ODP noise rules were ineffective, or unable to control, helicopter noise. We accept all that evidence and conclude that Rule 36.5.13 as notified is fundamentally sound. We also agree with Ms Evans' recommendation that the Advice Note should specify Queenstown and Wanaka Airports.
652. Our views on the non-compliance status of any breach of this rule is consistent with those we gave above in respect of Rule 36.5.3 above. As it was, we heard no evidence on this from the submitter.
653. The Stream 10 Hearing Panel has recommended that the final clause in the notified definition of noise in Chapter be inserted in this rule. We agree that is a more appropriate location and is a non-substantive change under Clause 16(2).
654. For those reasons we recommend that Rule 36.5.13 (renumbered 36.5.10) be adopted as notified, with the addition of the phrase from Chapter 2 and a minor amendment to the advice note.

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<sup>451</sup> ZJV (NZ) Limited v Queenstown Lakes District Council & Skyline Enterprises Limited [2015] NZEnvC 205

<sup>452</sup> Ruth Evans, Reply Statement, Section 9

655. We also note that, in addition to this rule, other rules in the Rural Zone relating to informal airports restrict the frequency of flights and impose setback requirements in certain situations. The combination of those rules should go some way to address the concerns of those submitters who sought the deletion or modification of this rule.

656. Turning to the Skyline issue, we agree with Ms Evans that turning a resource consent into district plan rules, when that consent is subject to a time limitation because of the potential adverse effects, is fraught with issues. We consider it would be poor resource management practice to create such a rule as it would restrict the Council's ability to adjust the terms of the activity if monitoring disclosed adverse environmental effects beyond those foreseen. In our view, if Skyline wishes to choose a better site for helicopter landing, and it requires a resource consent, then they should follow that process. We recommend that

17.8. submission be rejected. [Rule 36.5.14](#)

657. This rule sets noise limits for fixed wing aircraft using NZS6805 as the means of measuring and assessing aircraft noise. One submission<sup>453</sup> sought the retention of this rule, while two submissions<sup>454</sup> sought its replacement with an  $L_{max}$  limit and changing the non-compliance status to discretionary.

658. Again this issue is whether a standard specifically designed to measure and assess aircraft noise (NZS6805) should be used as the basis for setting the limits in this rule, or the general provisions used elsewhere in the District. We heard no evidence in support of the submissions seeking to amend this rule and see no reason to for there to be a different approach to setting noise limits for fixed wing aircraft from that used for setting noise limits for helicopters.

659. We recommend that Rule 36.5.14 (renumbered 36.5.11) be adopted as notified, and the advice note be amended to specify Queenstown and Wanaka Airports.

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<sup>453</sup> Submission 433, supported by FS1345 and opposed by FS1097, FS1117

<sup>454</sup> Submissions 607 and 621

<sup>455</sup> Submission 649

<sup>456</sup> Submission 243, opposed by FS1224, FS1245

<sup>457</sup> Submission 621

<sup>458</sup> Submission 758

### Attachment 3 - a list of names and addresses of persons to be served

Every person who made a further submission on my submission:

I am not aware of any further submissions on my submission.

However the following submitters appear to have made submissions on the same issues:

	Name	Email	Sub #
1.	Skydive Queenstown Limited	<a href="mailto:jmacdonald@mactodd.co.nz">jmacdonald@mactodd.co.nz</a>	122
2.	Richard Bowman	<a href="mailto:bowmanz@actrix.co.nz">bowmanz@actrix.co.nz</a>	143
3.	Christine Byrch	<a href="mailto:chrisbyrch@hotmail.com">chrisbyrch@hotmail.com</a>	243
4.	Debbie MacColl	<a href="mailto:deb.maccoll@gmail.com">deb.maccoll@gmail.com</a>	285
5.	Barn Hill Limited	<a href="mailto:firgrovefarm@gmail.com">firgrovefarm@gmail.com</a>	288
6.	Frank Wright	<a href="mailto:wright@wave.co.nz">wright@wave.co.nz</a>	385
7.	Queenstown Airport Corporation	<a href="mailto:kirsty.osullivan@mitchellpartnerships.co.nz">kirsty.osullivan@mitchellpartnerships.co.nz</a>	433
8.	Arthurs Point Protection Society	<a href="mailto:streatcg@xtra.co.nz">streatcg@xtra.co.nz</a>	475
9.	Totally Tourism Limited	<a href="mailto:sean@southernplanning.co.nz">sean@southernplanning.co.nz</a>	571
10.	Skyline Enterprises Limited	<a href="mailto:sean@southernplanning.co.nz">sean@southernplanning.co.nz</a>	574
11.	Te Anau Developments Limited	<a href="mailto:ben@jea.co.nz">ben@jea.co.nz</a>	607
12.	Real Journeys Limited	<a href="mailto:ben@jea.co.nz">ben@jea.co.nz</a>	621
13.	Barnhill Corporate Trustee Limited & DE, ME Bunn & LA Green	<a href="mailto:scott@southernplanning.co.nz">scott@southernplanning.co.nz</a>	626
14.	Andrew Fairfax	<a href="mailto:ben@jea.co.nz">ben@jea.co.nz</a>	660
15.	I and P Macauley	<a href="mailto:ben@jea.co.nz">ben@jea.co.nz</a>	662
16.	Jackie (Plus others) Redai (Plus others)	<a href="mailto:jackie@aaa.net.nz">jackie@aaa.net.nz</a>	713
17.	Wakatipu Aero Club	<a href="mailto:brett@townplanning.co.nz">brett@townplanning.co.nz</a>	723
18.	Adrian Snow	<a href="mailto:brett@townplanning.co.nz">brett@townplanning.co.nz</a>	730
19.	Revell William Buckham	<a href="mailto:brett@townplanning.co.nz">brett@townplanning.co.nz</a>	732
20.	Kerry Connor	<a href="mailto:brett@townplanning.co.nz">brett@townplanning.co.nz</a>	734
21.	Southern Lakes Learn to Fly Limited	<a href="mailto:brett@townplanning.co.nz">brett@townplanning.co.nz</a>	736
22.	Hank Sproull	<a href="mailto:brett@townplanning.co.nz">brett@townplanning.co.nz</a>	738

23.	Southern Lakes Learn to Fly Limited	<a href="mailto:brett@townplanning.co.nz">brett@townplanning.co.nz</a>	739
24.	Southern Lakes Aviation Limited	<a href="mailto:brett@townplanning.co.nz">brett@townplanning.co.nz</a>	760
25.	Shai Lanuel on behalf of Skytrek Tandems Ltd	<a href="mailto:brett@townplanning.co.nz">brett@townplanning.co.nz</a>	843
26.	Queenstown Park Limited	<a href="mailto:t.williams@remarkablespark.com">t.williams@remarkablespark.com</a>	FS1097
27.	Remarkables Park Limited	<a href="mailto:t.williams@remarkablespark.com">t.williams@remarkablespark.com</a>	FS1117
28.	Totally Tourism Limited	<a href="mailto:sean@southernplanning.co.nz">sean@southernplanning.co.nz</a>	FS1245
29.	Skydive Queenstown Limited	<a href="mailto:jmacdonald@mactodd.co.nz">jmacdonald@mactodd.co.nz</a>	FS1345
30.	Peter Fleming and Others	<a href="mailto:f888@icard.co.nz">f888@icard.co.nz</a>	FS1063

Accordingly, the following have been served:

[ben@jea.co.nz](mailto:ben@jea.co.nz); [bowmanz@actrix.co.nz](mailto:bowmanz@actrix.co.nz); [brett@townplanning.co.nz](mailto:brett@townplanning.co.nz);  
[chrisbyrch@hotmail.com](mailto:chrisbyrch@hotmail.com); [deb.maccoll@gmail.com](mailto:deb.maccoll@gmail.com); [f888@icard.co.nz](mailto:f888@icard.co.nz);  
[firgrovefarm@gmail.com](mailto:firgrovefarm@gmail.com); [jackie@aaa.net.nz](mailto:jackie@aaa.net.nz); [jmacdonald@mactodd.co.nz](mailto:jmacdonald@mactodd.co.nz);  
[kirsty.osullivan@mitchellpartnerships.co.nz](mailto:kirsty.osullivan@mitchellpartnerships.co.nz); [scott@southernplanning.co.nz](mailto:scott@southernplanning.co.nz);  
[sean@southernplanning.co.nz](mailto:sean@southernplanning.co.nz); [streatcg@xtra.co.nz](mailto:streatcg@xtra.co.nz); [t.williams@remarkablespark.com](mailto:t.williams@remarkablespark.com);  
[wright@wave.co.nz](mailto:wright@wave.co.nz);