

From: [Derek McLachlan](#)
To: [RPS](#)
Subject: Submission on RPS - Dunedin International Airport limited
Date: Friday, 3 September 2021 1:48:09 p.m.
Attachments: [image001.png](#)
[DAM-825164-291-88-1 Submission on Proposed RPS.docx](#)

Please find **attached** submission (in word doc form) filed on behalf of Dunedin International Airport limited.

Kind regards

Derek McLachlan
Senior Solicitor

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Written Submission on Proposed Otago Regional Policy Statement 2021

(Submissions must be received by Otago Regional Council by 3 pm Friday 3 September 2021)


To: Otago Regional Council

1. **Name of submitter** *(full name of person/persons or organisation making the submission. Note: The submissions will be referred to by the name of the submitter)*

Dunedin International Airport Limited

2. This is a submission on the **Proposed Otago Regional Policy Statement 2021**.
3. I **could not** gain an advantage in trade competition through this submission. *(See notes to person making submission)*
4. I **am** directly affected by an effect of the subject matter of the submission that
- a. adversely affects the environment; and
 - b. does not relate to trade competition or the effects of trade competition *(See notes to person making submission)*
5. I **wish** to be heard in support of my submission
6. If others make a similar submission, **will not** consider presenting a joint case with them at a hearing
7. **Submitter Details**

- a. **Signature of submitter**



- b. **Signatory name, position, and organisation** *(if signatory is acting on behalf of a submitter organisation or group referred to at Point 1 above)*

Name: Derek McLachlan

Position: Counsel for DIAL

Organisation: Gallaway Cook Allan

c. **Date: 3 September 2021**

Address for service of submitter (*This is where all correspondence will be directed*)

d. **Contact person** (*name and designation, if applicable*)

Phil Page

e. **Email:**

Phil.page@gallawaycookallan.co.nz

f. **Telephone:**

03 4777312

g. **Postal address** (*or alternative method of service under [section 352](#) of the Act*):

123 vogel Street, PO Box 1453, Dunedin 9054

8. My submission is:

<i>Column 1</i>	<i>Column 2</i>	<i>Column 3</i>	<i>Column 4</i>
<i>The specific provisions of the proposal that my submission relates to are:</i>	<i>I support or oppose the specific provisions or wish to have them amended.</i>	<i>The reasons for my views are:</i>	<i>I seek the following decision from the local authority:</i>
Overarching Statement:			

The Dunedin International Airport is situated at Momona. It occupies an area of approximately 300 hectares and is owned and operated by DIAL. Dunedin International Airport is an integral part of the local and regional transport network, providing a link to national and international destinations for passengers, goods and freight.

The Proposed RPS 2021 identifies a suite of policy protections for Nationally and Regionally Significant Infrastructure. DIAL supports the recognition of Dunedin International Airport within the proposed definitions and largely supports the proposed amendments. An important aspect of this submission is to manage any potential conflict with new or proposed activities within the vicinity of the airport, and to ensuring that reverse sensitivity effects of such activities are adequately managed.

We have identified the relevant definitions, and provisions of EIT-INF & EIT-TRAN sections below:

Definition of Nationally Significant Infrastructure	Support	DIAL supports the recognition of Dunedin International Airport as nationally significant infrastructure. Maintains a definition consistent with the NPS-UD 2020.	Retain as notified.
Definition of Regionally Significant Infrastructure	Support	Specifically recognises Dunedin airport infrastructure that is not captured by the definition of Nationally Significant Infrastructure. The combination of the two definitions captures the appropriate airport activities as either regionally or nationally significant.	Retain as notified.
Objective - EIT-INF-05 – Integration	Support	DIAL supports EIT-INF005 as it recognises the need to increased efficiency in the delivery, operation and use of the regionally and nationally significant infrastructure. DIAL seeks to ensure that this Objective is appropriately implemented by lower order policies which increase the	Retain as notified.

		efficiency in the existing regionally or regionally significant infrastructure.	
Policy EIT-INF-P10 - Recognising resource requirements	Support in part	We support the recognition of Nationally and Regionally Significant Infrastructure through the consenting process, however 'taking into account' identifies a low standard of recognition.	Amend as follows: <i>Decision making on the allocation or use of natural and physical resources must take into account recognise and provide for the needs of nationally and regionally significant infrastructure.</i>
EIT-INF-P14 – Decision making considerations	Support	EIT-INF-P14 provides an important protection against proposals with inappropriate locations, particularly for new activities that may result in significant adverse effects.	Retain as notified.
EIT-INF-P15 – Protecting nationally or regionally significant infrastructure	Support	EIT-INF-P15 seeks to 'avoid' the establishment of activities that may result in reverse sensitivity effects on nationally or regionally significant infrastructure where that may compromise the functional or operational needs of that infrastructure. DIAL supports the directive of 'avoid'. Additionally, DIAL supports this provision, as it places the onus on any prospective development to ensure that the reverse sensitivity effects will not arise. EIT-INF-P15 recognises the importance of existing nationally and regionally significant infrastructure and provides protection from establishment of all proposed activities (including other proposals that may be	Retain as notified.

		considered nationally and regionally significant infrastructure).	
EIT-INF-M4 & 5	Support	<p>DIAL support the prioritisation of sites where adverse effects on natural and physical resources can be avoided, or at least minimised.</p> <p>DIAL consider that as nationally significant infrastructure, that the District plan should contain provisions that ensure that adverse effects on such resource should be avoided, or at least minimised.</p> <p>DIAL's physical resources are recognised through EIT-INF-M4(2) and EIT-INF-M5(7).</p>	Retain as notified.
EIT-INF-AER7	Support	DIALS supports the Anticipated Environmental Result that nationally and regionally significant infrastructure is protected from reverse sensitivity effects caused by incompatible activities.	Retain as notified.
EIT-TRAN-O7 – Effective, efficient, and safe transport	Support	DIAL supports the identification of effective, efficient and safe' within the Objective frameworks. DIAL seeks to ensure that the underlying policy framework implements this requirements (particularly through the EIT-INF section of the Proposed RPS).	Retain as notified
EIT-TRAN-P21 – Operation of the transport system	Support	<p>DIAL supports the policy, in particular:</p> <ol style="list-style-type: none"> i. <u>avoiding adverse effects of activities on the functioning of the transport system;</u> ii. <u>avoiding development that forecloses an opportunity to adapt, upgrade or develop the transport system to meet future transport demand;</u> 	Retain as notified

		Both of these components of the policy support the ongoing operation and development of transport systems. These are an important consideration when considering the appropriate location of potentially competing land uses.	
EIT-TRAN-M8 – District plans	Support	DIAL supports placing a requirement on the territorial authority to prepare or amend their plan to: <ul style="list-style-type: none"> i. <u>restrict or prevent the establishment or expansion of activities adjacent to transport infrastructure that may compromise the operation or safety of the transport system.</u> 	Retain as notified