

From: [Rebecca Crawford](#)
To: [RPS](#)
Cc: [Phil Page](#)
Subject: Further Submission RPS - Dunedin International Airport Limited
Date: Thursday, 11 November 2021 3:09:24 p.m.
Attachments: [image002.png](#)
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Please find **attached** further submission (in word format) filed on behalf of Dunedin International Airport Limited.

Kind Regards



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FORM 6

**FURTHER SUBMISSION ON PUBLICALLY NOTIFIED PROPOSAL FOR POLICY STATEMENT
BY DUNEDIN INTERNATIONAL AIRPORT LIMITED
PURSUANT TO CLAUSE 6 OF THE FIRST SCHEDULE,
RESOURCE MANAGEMENT ACT 1991**

To: Otago Regional Council
Private Bag 1954
DUNEDIN

Further submission by: Dunedin International Airport Limited (DIAL)
on: Proposed Otago Regional Policy Statement June 2021
Date 11 November 2021

1. Introduction

Dunedin International Airport Limited (**DIAL**) owns and operates Dunedin International Airport (**Airport**). As a part 139 certified aerodrome, the Airport is an integral part of the local, regional and national transport system with over 1 million passengers passing through annually (with unrestricted travel). The Airport also serves an essential function connecting cargo and freight to national and international destinations. For these reasons, DIAL has an interest in PRPS21 that is greater than the public generally.

DIAL made an original submission on the Proposed Otago Regional Policy Statement (**PRPS21**) seeking a suite of relief to better manage, enable, protect and provide for Dunedin Airport as nationally significant infrastructure (**NSI**) and regionally significant infrastructure (**RSI**) in the Otago region.

2. Further Submission

DIAL makes this submission in support of and opposition to various original submissions in PRPS21. The various submission points that DIAL supports or opposes and the decisions sought are set out in **Appendix 1**.

DIAL wishes to be heard in support of its further submission and does not wish to present a joint case with submitters making a similar submission.



Phil Page / Rebecca Crawford

Counsel for Dunedin International Airport Limited

Dated **11 November 2021**

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Appendix 1:

Submission	Submitter Name	Submission Point	Support/Oppose and decision requested.
00307	Christchurch International Airport Limited (CIAL)	00307.015, 00307.018	DIAL supports prioritising safe operation of RSI. DIAL seeks the relief be allowed .
00307	Christchurch International Airport Limited (CIAL)	00307.020	DIAL opposes removing recognition for NSI and RSI when providing for new infrastructure. DIAL seeks the relief be disallowed .
00313	Queenstown Airport Corporation	00313.015	DIAL supports protection of NSI and RSI from the establishment of incompatible activities. DIAL seeks the relief be allowed .
00313	Queenstown Airport Corporation	00313.018	DIAL supports enabling the operation and maintenance of existing NSI and RSI. DIAL supports adding clarity by replacing 'minimising' with remedying and mitigating. DIAL seeks the relief be allowed .
00313	Queenstown Airport Corporation	00313.019	DIAL supports appropriately providing for RSI. DIAL seeks the relief be allowed .
00313	Queenstown Airport Corporation	00313.022	DIAL supports increasing protection of NSI and RSI, from adverse and reverse sensitivity effects. DIAL also supports protecting NSI and RSI from developments which foreclose future opportunities. DIAL seeks the relief be allowed .
00314	Transpower New Zealand Limited	00314.036	DIAL supports the protection of existing NSI and RSI from incompatible activities establishing that may generate reverse sensitivity effects. DIAL seeks the relief be allowed .
00321	New Zealand Infrastructure Commission	00321.106	While DIAL in principle supports nationally consistent definitions of NSI and RSI, DIAL opposes linking the PRPS21 definition to a future strategy document. DIAL seeks the relief be disallowed .

00139	Dunedin City Council	00139.006	DIAL opposes defining infrastructure in a manner inconsistent with section 2 of the Resource Management Act 1991. DIAL seeks the relief be disallowed .
00139	Dunedin City Council	00139.007	DIAL opposes defining RSI in a manner inconsistent with definition of infrastructure in section 2 of the Resource Management Act 1991. DIAL seeks the relief be disallowed .
00139	Dunedin City Council	00139.164	DIAL opposes including new infrastructure in this policy which is for existing infrastructure. New infrastructure is addressed in EIT-INF-P13. The PRPS21 appropriately prioritises the needs of existing NSI and RSI over new infrastructure by way of its classification and for the simple reason that it is already <i>in situ</i> . Treating new and existing infrastructure the same risks further entrenching legacy issues and impairing the operations and function of infrastructure of national and regional significance. DIAL seeks the relief be disallowed .
00139	Dunedin City Council	00139.166	DIAL opposes removing protection for NSI and RSI against proposals that might cause irreversible effects. DIAL seeks the relief be disallowed .
00139	Dunedin City Council	00139.167	DIAL opposes reducing protection of NSI and RSI against proposals likely to lead to reverse sensitivity effects. DIAL seeks the relief be disallowed .
00139	Dunedin City Council	00139.171	DIAL opposes reducing protection of NSI and RSI from the risk of adverse effects, including reverse sensitivity effects, which may result from ad hoc planning. DIAL seeks the relief be disallowed .
00139	Dunedin City Council	00139.175	DIAL opposes narrowing the types of transport modes to be provided for in the PRPS21. DIAL seeks the relief be disallowed .

00139	Dunedin City Council	00139.177	DIAL opposes introducing a new objective for airport activities because the Airport as NSI and RSI is obliged to operate effectively, efficiently and within environmental limits by objective EIT-INF-04. DIAL seeks the relief be disallowed .
00139	Dunedin City Council	00139.183	DIAL opposes increasing the risk of reverse sensitivity effects from incompatible activities seeking to locate inappropriately. DIAL seeks the relief be disallowed .
00138	Queenstown Lakes District Council	00138.106	DIAL opposes defining RSI in a manner inconsistent with definition of infrastructure in section 2 of the Resource Management Act 1991. DIAL seeks the relief be disallowed .
00138	Queenstown Lakes District Council	00138.124	DIAL opposes reducing protection of NSI and RSI from the risk of adverse effects, including reverse sensitivity effects, which may result from ad hoc planning. DIAL seeks the relief be disallowed .
00408	Business South Inc	00408.007	DIAL opposes expanding the definition of NSI without protecting existing NSI. New infrastructure that meets the NSI definition would be NSI without the need for further clarification or expansion. DIAL seeks the relief be disallowed .
00408	Business South Inc	00408.005	DIAL opposes expanding the definition of NSI adopted from the National Policy Statement on Urban Development 2020 (NPSUD) as ultra vires the PRPS21. Currently, this expansion would require a change in national policy which DIAL considers inappropriate given that NSI is so designated to recognise its national importance. DIAL seeks the relief be disallowed .
00408	Business South Inc	00408.016	DIAL opposes defining RSI in a manner inconsistent with definition of infrastructure in section 2 of the Resource Management Act 1991. DIAL seeks the relief be disallowed .

00239	Federated Farmers of New Zealand	00239.125	DIAL opposes dilution of protection for NSI and RSI as a consequence of expanding this protection to infrastructure generally. DIAL seeks the relief be disallowed .
00239	Federated Farmers of New Zealand	00239.129	DIAL opposes reducing protection of NSI and RSI to 'recognise and provide for' and limiting the obligation to do so 'to the extent reasonably practicable'. DIAL seeks the relief be disallowed .
00239	Federated Farmers of New Zealand	00239.131	DIAL opposes reducing protection of NSI and RSI from reverse sensitivity effects. DIAL seeks the relief be disallowed .
00236	Horticulture New Zealand	00236.082	DIAL opposes reducing protection of NSI and RSI from reverse sensitivity effects. DIAL seeks the relief be disallowed .
00235	OWRUG	00235.114, 00235.116, 00235.117, 00235.118	DIAL is neutral to the proposed relief so long as recognition of NSI and RSI is maintained.
00315	Aurora Energy Limited	00315.048	DIAL is neutral to the proposed relief so long as recognition of NSI and RSI is maintained.
00206	Trojan Holdings Limited (Trojan)	00206.049	DIAL opposes expanding this policy to infrastructure generally which does not protect and prioritise the operational and functional needs of NSI and RSI over other infrastructure. DIAL seeks the relief be disallowed .
0041	Wayfare Group Ltd	00411.062	DIAL opposes expanding this policy to infrastructure generally which does not protect and prioritise the operational and functional needs of NSI and RSI over other infrastructure. DIAL seeks the relief be disallowed .
00305	Waka Kotahi NZ Transport Agency	00305.035	DIAL supports increasing protection of nationally and regionally significant infrastructure from the establishment of new activities that may result in reverse sensitivity effects. DIAL seeks the relief be allowed .

00509	Wise Response Society Inc	00509.099	Dial opposes removal of 'transport' and 'air', both are appropriately addressed in the transport section of the PRPS21. DIAL seeks the relief be disallowed .
00509	Wise Response Society Inc	00509.100	DIAL opposes the imposition of restrictions which may impact on its scheduling flexibility. DIAL seeks the relief be disallowed .