

From: [Melissa Brook](#)
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Subject: 2021 11 12 - PORPS Further Submission -QAC
Date: Friday, 12 November 2021 4:51:05 p.m.
Attachments: [ATT00001.png](#)
[2021 11 12 - PORPS Further Submission -QAC.docx](#)

Kia ora,

Please find attached Further Submissions to the proposed Otago Regional Policy Statement on behalf of QAC.

Ngā mihi

Melissa

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FORM 6

**FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO,
SUBMISSION ON NOTIFIED PROPOSED POLICY STATEMENT
OR PLAN, CHANGE OR VARIATION**

Clause 8 of Schedule 1, Resource Management Act 1991

To **Otago Regional Council**

Name **Queenstown Airport Corporation (QAC)**

This is a further submission in opposition to or in support of submissions on the proposed Otago Regional Policy Statement (PORPS).

QAC has an interest in the PORPS that is greater than the interest the general public has and made an original submission on the PORPS.

Queenstown Airport Corporation

QAC is a council-controlled trading organisation for the purposes of the Local Government Act 2002. The company is owned by one majority and one minority shareholder:

- 75.01% by the Queenstown Lakes District Council (QLDC)
- 24.99% by Auckland International Airport Limited.

QAC also has an obligation as a Council Controlled Trading Organisation ("CCTO") to support QLDC in providing good quality local infrastructure that is appropriate to meet current and anticipated future needs and circumstances.

QAC's primary activity is the safe and efficient operation of Queenstown Airport, facilitating air connectivity through the provision of infrastructure in the region, to meet the needs of our customers, the residents of, and visitors to the lower South Island. This includes the provision of appropriate and sound aeronautical and associated infrastructure and facilities for the operations at the airport. QAC also manages Wanaka Airport and the Glenorchy Airfield on QLDC's behalf.

QAC is responsible for:

- Ensuring effective stewardship of Queenstown and Wanaka airports, including meeting all relevant statutory obligations
- Providing airfield, airside, terminal and landside facilities and infrastructure at the airports that deliver the required outcomes for all operators and users

- Ensuring the operational resilience of Queenstown Airport as a life-line utility, as required under the Civil Defence Emergency Management Act 2002.

QAC is a requiring authority in terms of the Resource Management Act 1991 for Queenstown Airport. The airport is subject of two designations in the Queenstown Lakes District Plan: the “Aerodrome Purposes” designation (Designation 2) which relates to the land on which the airport is situated, and the “Approach and Land Use Control” designation (Designation 4) which relates to the airspace around the airport.

QLDC is the requiring authority for Wanaka Airport, with QAC managing operations of this airport on the requiring authority’s behalf. Wanaka Airport is the subject of designations in the Queenstown Lakes District Plan for “Aerodrome Purposes” (Designation 64) and for “Approach and Land Use Control” (Designation 65).

QAC therefore has a significant interest in planning documents, such as the PORPS, that might influence or affect its ability to maintain and operate the airports, and in the case of Queenstown Airport, to develop and upgrade the airport, in an efficient and effective manner.

Queenstown Airport

At Queenstown Airport, QAC provides for scheduled domestic and international air services, commercial and private general aviation operations and is the Lakes District base for the Otago Rescue Helicopter service.

Wanaka Airport

Wanaka Airport is owned by QLDC. QAC manages Wanaka Airport under a Management Services Agreement with QLDC. Wanaka Airport facilitates scheduled domestic air services, and both commercial and private general aviation operations. Sounds Air introduced scheduled domestic services between Wanaka and Christchurch in November 2020. In addition, Wanaka Airport hosts the biennial Warbirds over Wanaka airshow and is one of seven locations used globally for NASA’s Scientific Balloon Programme.

Glenorchy Airfield

QAC provides grounds maintenance services and airstrip management at Glenorchy on QLDC’s behalf.

QAC makes the following further submission

The further submissions from QAC on the PORPS are attached to this document in **Attachment 1** and form part of this further submission.

QAC could not gain an advantage in trade competition through this submission.

QAC's further submission is:

In its original submission, QAC emphasised the importance of ensuring that the PORPS adequately addresses nationally and regionally significant infrastructure. That the provisions relating to nationally and regionally significant infrastructure are consistent with, offer no less protection and are no less enabling than, the provisions relating to nationally and regionally significant infrastructure contained in the partially operative 2019 Otago Regional Policy Statement, and so that there is a clear hierarchy within the PORPS as to the objectives, policies and methods that apply to nationally and regionally significant infrastructure.

QAC seeks to ensure that the key principles identified in its original submission and summarised above are appropriately recognised and provided for in the PORPS

In addition to these matters, Christchurch International Airport Limited's submission was based on the assumptions that:

- “[t]he provision of domestic and international connectivity is an important driver of social and economic prosperity in the region, and that cannot be maximised within existing airport constraints at Queenstown which is forecast to reach its current capacity limits within the next 10 years”, and
- “[c]urrent projections indicate that current air travel capacity in the Otago region will be subject to increased demand beyond its current capacity”.

Queenstown Airport can cater to significant growth for travel into the region in the future through a combination of advances in aircraft technology including larger and quieter narrow-body aircraft; and careful and effective management of its noise boundary capacity. It is premature and inaccurate for CIAL to base its submission on the above assumptions.

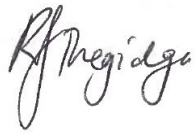
QAC seeks the following decision from the local authority:

That the submission points contained above and in **Attachment 1** which is attached to and forms part of this submission be accepted, or that the PORPS be amended in a similar or such other way as may be appropriate to address QAC's submission points; and

Any consequential changes, amendments or decisions that may be required to give effect to the matters raised in QAC's submission.

QAC wishes to be heard in support of its submission.

If others make a similar submission, QAC would be prepared to consider presenting a joint case with them at any hearing.



Rachel Tregidga

General Manager, Property and Planning, Queenstown Airport Corporation

Dated at Queenstown this 12th day of November 2021

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Attachment 1

Submitter Org	Original Submission No	Provision	Submitter Position	Submission Summary	QAC Position	QAC Reasoning
Port of Otago	00301.036	TERP-Definitions	Amend	Amend to include a definition to distinguish between activities that have differing policy tests in the RPS: <ul style="list-style-type: none"> - Operation and maintenance of infrastructure - Upgrades and development of existing infrastructure - New infrastructure 	Support	QAC supports clearly defining upgrades and development as compared to new infrastructure to assist with interpretation of the PORPS.
New Zealand Infrastructure Commission	00321.006	TERP-Definitions	Support	Retain definition of operational need as notified and ensure it is also used in all objectives and policies that relate to the constraints on infrastructure's ability to manage adverse effects.	Support	QAC supports the use of operational need in all objectives and policies that relate to the constraints on infrastructure's ability to manage adverse effects, particularly as it relates to nationally and regionally significant infrastructure.
Christchurch International Airport Limited (CIAL)	00307.001	TERP-Definitions	Amend	Amend Regionally Significant Infrastructure as follows: "Means-Includes" (6) airports and aerodromes and their ancillary infrastructure, including the following airports: Dunedin, Queenstown, Wanaka, Alexandra, Balclutha, Cromwell, Oamaru, Taieri	Oppose	QAC opposes the amendment. The use of 'includes' and 'including', means that the definition is not exhaustive. The relief sought would also result in clause (6) having an unknown and potentially very broad reach and would capture many more airports and aerodromes within the Otago region than are currently considered regionally significant infrastructure, i.e. Roxburgh Aerodrome, Glenorchy Airport, Makarora Airstrip, Cromwell Racecourse Aerodrome. This will give rise to issues of ambiguity and uncertainty in the application and administration of the PORPS, which is both undesirable and inefficient.
Boxer Hills Trust	00025.002	IM-P1	Oppose	Delete IM-P1	Support	QAC supports this submission point. As outlined in its submission QAC considers that the ordinary principles of interpretation should apply to the PORPS.
Ravensdown Limited	00121.019	IM-P1	Oppose	Delete IM-P1	Support	QAC supports this submission point. As outlined in its submission QAC considers that the ordinary principles of interpretation should apply to the PORPS.
Waterfall Park Developments Ltd	00023.002	IM-P1	Oppose	Delete IM-P1	Support	QAC supports this submission point. As outlined in its submission QAC considers that the ordinary principles of interpretation should apply to the PORPS.
Aurora Energy Ltd	00315.016	IM-P2	Oppose	Delete IM-P2	Support	QAC supports this submission point. As outlined in its submission QAC considers that this policy reflects the objective of the National Policy Statement for Freshwater Management and applying these priorities across all resource types is inappropriate and likely to cause implementation difficulties.

Boxer Hills Trust	00025.003	IM-P2	Oppose	Delete IM-P2	Support	QAC supports this submission point. As outlined in its submission QAC considers that this policy reflects the objective of the National Policy Statement for Freshwater Management and applying these priorities across all resource types is inappropriate and likely to cause implementation difficulties.
PowerNet Ltd	00511.013	IM-P2	Oppose	Delete IM-P2	Support	QAC supports this submission point. As outlined in its submission QAC considers that this policy reflects the objective of the National Policy Statement for Freshwater Management and applying these priorities across all resource types is inappropriate and likely to cause implementation difficulties.
Contact Energy Ltd	00318.010	IM-P14	Oppose	Delete IM-P14	Support	QAC supports this submission point. QAC agrees that there is inherent uncertainty within the drafting of this policy.
Aurora Energy Ltd	00315.043	EIT-INF-O4	Amend	Delete or amend to remove the wording “within environmental limits” in this provision and elsewhere in RPS21.	Support in part	QAC supports the removal of the words “within environmental limits” in EIT-INF-O4 and elsewhere in the PORPS.
Port Otago Ltd.	00301.032	EIT-INF-O4	Amend	Redraft so it is enabling, for example as follows: “Effective, efficient, and resilient infrastructure enables the people and communities of Otago to provide for their social and cultural well-being, their health and safety, and supports sustainable economic development and growth within the region within environmental limits.”	Support	QAC supports strengthening the objective to ensure it is enabling. QAC has drafted alternative wording in its submission, providing an alternative objective to replace that provided within the PORPS.
Dunedin Airport Limited	00316.004	EIT-INF-P10	Amend	Amend as follows: “Decision making on the allocation or use of natural and physical resources must take into account <u>recognise and provide for</u> the needs of nationally and regionally significant infrastructure.”	Support	QAC supports strengthening the policy to ensure the needs of nationally and regionally significant infrastructure are recognised in decision-making processes.
Dunedin City Council	00139.164	EIT-INF-P12	Amend	Amend as follows: - Replace ‘development of’ with ‘new’.	Oppose	QAC opposes including new infrastructure in this policy which is for existing infrastructure. Policy EIT-INF-P13 addresses new infrastructure. It is appropriate that the PORPS prioritise the needs of existing Nationally and Regionally Significant Infrastructure over new infrastructure as it is already established and providing critical services to people and communities.
Royal Forest and Bird Protection Society of New Zealand	00230.130	EIT-INF-P12	Amend	Add the following clause to EIT – INF – P12: “adverse effects on indigenous biodiversity are avoided and managed as set out in the BIO and CE chapters and natural character in the CE chapter” Make amendments to additional policies as needed so that provisions which would provide for or	Oppose	QAC submits that nationally and regionally significant infrastructure should be subject to its own bespoke management regime within the PORPS, so that it is clear which objectives, policies and methods apply in any given case, so to avoid potential conflicting policy approaches within the

				enable infrastructure activities, must be in the context of also protecting, maintaining and restoring indigenous biodiversity.		PORPS to such infrastructure, and to ensure efficient and certain administration and implementation.
Christchurch International Airport Limited	00307.020	EIT-INF-P13	Oppose	Delete EIT-INF-P13	Oppose	QAC seeks the relief outlined in its original submission. QAC considers that the PORPS should include a policy setting out the priority order to be observed when locating and developing new infrastructure.
Contact Energy Limited	00318.033	EIT-INF-P13	Oppose	Delete EIT-INF-P13	Oppose	QAC seeks the relief outlined in its original submission. QAC considers that the PORPS should include a policy setting out the priority order to be observed when locating and developing new infrastructure.
PowerNet Ltd.	00511.025	EIT-INF-P13	Oppose	Delete EIT-INF-P13	Oppose	QAC seeks the relief outlined in its original submission. QAC considers that the PORPS should include a policy setting out the priority order to be observed when locating and developing new infrastructure.
Aurora Energy Limited	00315.049	EIT-INF-P13	Amend		Oppose	QAC opposes any amendment that would result in nationally and regionally significant infrastructure not retaining a higher level of protection than other infrastructure.
Chorus New Zealand Ltd., Spark New Zealand Trading Ltd and Vodafone New Zealand	00310.007	EIT-INF-P13	Amend	The effects management regime in Clause 2(a) of the policy applies to all infrastructure.	Oppose	QAC opposes any amendment that would result in nationally and regionally significant infrastructure not retaining a higher level of protection than other infrastructure.
Trojan Holdings Ltd	00206.049	EIT-INF-P13	Amend		Oppose	QAC opposes any amendment that would result in nationally and regionally significant infrastructure not retaining a higher level of protection than other infrastructure.
Wayfare Group Ltd	00411.062	EIT-INF-P13	Amend		Oppose	QAC opposes any amendment that would result in nationally and regionally significant infrastructure not retaining a higher level of protection than other infrastructure.
Queenstown Lakes District Council	00138.124	EIT-INF-M5	Amend	Delete (1)	Oppose	It is essential that the PORPS direct district plans to require a strategic approach to the integration of land use and nationally or regionally significant infrastructure.
Horticulture New Zealand	00236.086	HAZ-NH-P9	Amend	Delete (4)	Oppose	It is appropriate to protect lifeline utilities, particularly as it relates to reverse sensitivity effects.
Meridian Energy Ltd	00306.075	UFD-O3	Amend	Addition: (3) the potential for reverse sensitivity effects on nationally and regionally significant infrastructure is avoided; and	Support	Strategic Planning should be used to avoid reverse sensitivity effects on nationally and regionally significant infrastructure.
Aurora Energy Ltd	00315.079	UFD-P3	Amend	Addition: (2) is well served by existing of planned development infrastructure and additional infrastructure, and does not compromise	Support	QAC supports this submission point.

				<u>the safe and efficient ongoing use of regionally significant infrastructure,</u>		
Aurora Energy Ltd	00315.083	APP3	Amend	Remove limits as to when offsetting can be offered in clause (1) Otherwise align to achieve consistency with national direction via the draft NPSIB. Amend the offsetting requirements and outcomes so as to achieve consistency with recommended best practice for offsetting and/or national direction via the Draft NPSIB.	Support	QAC supports this submission point for the reasons outlined in its original submission.
Contact Energy Ltd	00318.021	APP3	Amend	Remove limits as to when offsetting can be offered in clause (1) Otherwise align to achieve consistency with national direction via the draft NPSIB. Amend the offsetting requirements and outcomes so as to achieve consistency with recommended best practice for offsetting and/or national direction via the Draft NPSIB.	Support	QAC supports this submission point for the reasons outlined in its original submission.
Aurora Energy Ltd	00315.084	APP4	Amend	Remove limits as to when biodiversity compensation can be offered in clause (1) Otherwise align to achieve consistency with national direction via the draft NPSIB. Amend the compensation requirements and outcomes so as to achieve consistency with recommended best practice for compensation and/or national direction via the Draft NPSIB.	Support	QAC supports this submission point for the reasons outlined in its original submission.
Contact Energy Ltd	00318.022	APP4	Amend	Remove limits as to when biodiversity compensation can be offered in clause (1) Otherwise align to achieve consistency with national direction via the draft NPSIB. Amend the compensation requirements and outcomes so as to achieve consistency with recommended best practice for compensation and/or national direction via the Draft NPSIB.	Support	QAC supports this submission point for the reasons outlined in its original submission.