

**SUBMISSION ON PUBLICLY NOTIFIED RESOURCE CONSENT
APPLICATIONS UNDER SECTION 95A OF THE RESOURCE MANAGEMENT
ACT 1991**

TO: Otago Regional Council

SUBMISSION ON: Resource consent applications lodged by Queenstown Lakes District Council ("**QLDC**") to construct and operate a diversion channel within the bed of the Shotover River / Kimiākau delta (RM25.177), and to dispose of treated wastewater to water from a wastewater treatment plant and construct a riprap outfall structure in the bed of the Shotover River / Kimiākau delta (RM25.206) ("**Applications**")

SUBMITTER: Queenstown Airport Corporation Limited ("**QAC**")

1. INTRODUCTION

- 1.1 QAC is responsible for the management and development of Queenstown Airport. Being the main domestic and international airport for the Southern Lakes region, Queenstown Airport is a critical national and regional infrastructure asset. As a significant infrastructure asset, majority-owned by QLDC, Queenstown Airport makes important contributions to the local and national economy.
- 1.2 The Shotover River and QLDC's Shotover Wastewater Treatment Plant ("**SWWTP**") are located near Queenstown Airport. As outlined in the Applications, the operation of the SWWTP has previously resulted in ponding water in the DAD disposal field which attracted birds and brought bird activity closer to the Airport. Birds are a known hazard to aircraft and the consequences of a bird strike are significant.
- 1.3 QLDC subsequently determined the ponding of the DAD disposal field and bird activity posed an unacceptable risk to aircraft safety and used emergency works powers under the Resource Management Act 1991 ("**RMA**") to discharge treated wastewater directly to the Shotover River. Through the Applications, QLDC seeks resource consents for the ongoing adverse effects of the discharge, and to construct and operate a riprap outfall structure and a diversion channel within the bed of the Shotover River.

1.4 It is fundamental to QAC that activities around Queenstown Airport are compatible with, and ensure, its ongoing operation in a safe and efficient manner.

1.5 QAC is not a trade competitor for the purposes of section 308B of the RMA.

2. NATURE AND SCOPE OF THE SUBMISSION

2.1 QAC is interested in the entirety of the Applications.

2.2 QAC neither supports nor opposes the Applications, ie it is neutral as to whether the Applications are granted. QAC is concerned to ensure that if the Applications are granted, the potential adverse effects on Queenstown Airport and QAC's ability to safely and efficiently provide aircraft operations are avoided, remedied or mitigated.

3. REASONS FOR SUBMISSION

3.1 QAC seeks to ensure that the Applications, if granted:

- (a) promote the sustainable management of resources, and therefore achieve the purpose and principles of the RMA;
- (b) are not contrary to Part 2 and other provisions of the RMA;
- (c) meet the reasonably foreseeable needs of future generations;
- (d) enable social, economic and cultural wellbeing;
- (e) are not contrary to the purposes and provisions of the relevant planning documents, including the Operative Otago Regional Policy Statement, Regional Plan: Water for Otago, and the Operative and Proposed Queenstown Lakes District Plans; and
- (f) avoid, remedy or mitigate adverse environmental effects.

3.2 Without limiting the generality of paragraph 3.1 above, the specific reasons QAC makes this submission on the Applications are as follows:

- (a) Aviation safety is critical to QAC. QAC is concerned to ensure that the Applications, and ongoing operation of the SWWTP, do not adversely affect the safe operation of Queenstown Airport.

- (b) Wildlife management is an ongoing safety priority for QAC. QAC remains concerned about the potential for bird activity at the SWWTP and the consequential risk of bird strike. QAC seeks to ensure the risk of bird strike is as low as reasonably practicable.
- (c) In the Applications, QLDC seeks an expiry date on the resource consents of 31 December 2030. This is intended to allow time for QLDC to seek consent, design and implement a long-term disposal solution for the SWWTP. The draft conditions provided with the Applications propose milestones to be achieved within the term of the resource consents and progress reports to be provided to key stakeholders. As a stakeholder with a direct interest in the long-term solution for the operation of the SWWTP, QAC is concerned to ensure any conditions relating to the long-term solution are appropriate.

4. RELIEF SOUGHT

4.1 If the Applications are granted, QAC seeks:

- (a) conditions are imposed to ensure adverse effects on Queenstown Airport's operations are avoided, remedied or mitigated; and
- (b) such further other relief or consequential amendments as considered appropriate and necessary to address the concerns set out in this submission.

4.2 QAC wishes to be heard in support of this submission. If others make a similar submission, QAC will consider presenting a joint case with them at the hearing.

QUEENSTOWN AIRPORT CORPO

agents Russell McVeagh:



Signature:

Date:

3 November 2025

Address for Service:

C/- Lauren Rapley / Meg Anderson
Russell McVeagh

Barristers and Solicitors
Level 30
Vero Centre
48 Shortland Street
PO Box 8/DX CX10085
AUCKLAND 1140

Telephone:

+64 9 367 8000

Email:

lauren.rapley@russellmcveagh.com
meg.anderson@russellmcveagh.com