

Before the Panel of Hearing Commissioners

In the matter of The Resource Management Act 1991

And

In the matter of The Queenstown Lakes District Council proposed District Plan

Memorandum from the Board of Airline Representatives
of New Zealand Incorporated (BARNZ)

22 March 2016

MAY IT PLEASE THE PANEL:

1. Further to the Panel's direction that other interested parties should have the opportunity to comment on the outcome of expert conferencing undertaken by planners for the Queenstown Airport Corporation, the Council and others on Chapters 3 and 4 of the Proposed Plan, the Board of Airline Representatives of New Zealand (BARNZ) provides this memorandum to the Panel.
2. BARNZ is an industry representative organisation comprising airlines operating scheduled international air transport services to New Zealand. All of the airlines operating scheduled international air transport services into Queenstown Airport are members of BARNZ.
3. BARNZ has reviewed the Expert Conferencing Statement and section 32AA Evaluation provided by the planners pursuant to the Panel's direction and provides the following comments and observations:
 - a. BARNZ asks whether the new policy 3.2.8.1.1, which refers to the continued operation, maintenance and upgrading of nationally or regionally significant infrastructure, also needs to refer to the expansion of such infrastructure. Other policies or objectives such as objective 3.2.8.2 and policy 4.2.7.1 have also additionally included the concepts of 'development' or 'expansion', which raises the question going forward as the Plan is applied in the future of what potential significance would be given to the lack of such terms in policy 3.2.8.1.1.
 - b. BARNZ supports the new policy 3.2.8.2.1 which recognises the importance of the development and use of infrastructure to the district.
 - c. BARNZ supports the suggested addition of the words 'or within the Outer Control Boundary' to Policy 4.2.2.4. The various rules contained in other parts of the proposed plan provide that there are areas in close proximity to Queenstown Airport where it is considered inappropriate for there to be new or increased development of activities that are sensitive to aircraft noise. It is entirely appropriate for this to be reflected in the overarching policies that feed into those rules. Moreover, including reference to the outer control boundary in Policy 4.2.2.4 as an instance where land is not suitable for urban development or intensification provides a clear signal to users of the plan of the presence and purpose of the Outer Control Boundary, which aids in improving the transparency and application in practice of the plan by residents of the Queenstown Lakes District.
 - d. BARNZ supports the new objectives and policies in section 4.2.7 which address noise boundaries around the Queenstown Airport. BARNZ considers that it is vital that the new plan reflects the outcomes of the PC35 process which considered and developed noise mitigation obligations for the airport.

- e. BARNZ supports the new objectives and policies in section 4.2.8 which address the need to protect the airport from reverse sensitivity effects caused by activities sensitive to aircraft noise being inappropriately established on land too close to Queenstown Airport. However, BARNZ notes that unlike policy 4.2.8.2, objective 4.2.8 and policy 4.2.8.1 do not refer to the planning tools of the Air Noise Boundary and the Outer Control Boundary, instead using the less defined concept of 'proximity' to Queenstown Airport. BARNZ considers that greater clarity would be achieved if the appropriate noise boundaries were expressly named and included in all of the provisions in 4.2.8.

Dated this 22nd day of March 2016

Kristina Cooper
Legal and Regulatory Manager
Board of Airline Representatives of New Zealand