

The Hearings Panel for the Proposed Queenstown Lakes District Plan.

Chapter 24, Wakatipu Basin, Rural Amenity Zone – Informal Airports.

Further Submission of the Aircraft Owners and Pilots Association of New Zealand. (AOPA)

My name is Robin Vance Boyd. I have been involved with the Proposed District Plan process on behalf of AOPA since 2015. I have been asked to present this submission.

History.

1. In 2015 Council prepared a fact sheet and a S32 report relating to what were called “Informal Airports”. The overarching intention was to simplify and streamline the provisions for Informal Airports, while maintaining amenity values. The report recognised that the current system of requiring resource consents was cumbersome, time consuming and expensive and required considerable resource input from all parties.
2. The logic expressed above is reasonable given that most if not all resource consent applications for private landings and take offs have been granted, even although adjacent dwellings have all been within 500m. In one case there were 17 dwellings at distances between 120m and 475m, in another the landing site was adjacent to an opposing neighbour’s residence. A major factor in the granting of applications has been that the noise has been within limits despite the separation distances being much less.
3. AOPA has always supported and endorsed the sentiments expressed in the Rural Zone S32 report and embraced the concept that Council intended to cater for both fixed wing aircraft and helicopters.
4. The problem that we identified was that Council proposed a 500m separation of an airport from the notional boundary of any neighbouring residential site and while this sounds reasonable the reality is that in our District it can rarely be achieved.
5. We have been consistent with our views in the numerous submissions made over the past three years.

The Wakatipu Basin.

1. When we originally made submissions, the Wakatipu Basin rural area was part of the Rural Zone. The basin was later separated, as set out in stage two, chapter 24 and in terms of the current discussion was divided into the Rural Lifestyle Precinct and The Rural Amenity Zone.
2. During September 2018 AOPA made submissions relating to both the Lifestyle Precinct and the Amenity Zone. (Attached). The submissions in so far as they related to the Amenity Zone were struck out following an application from Counsel for Council.
3. A hearing relating to the Lifestyle Precinct was held in October 2018. AOPA was represented by Mr Jules Tapper, a copy of his further submission is attached.
4. In December 2018 a commissioner decided that AOPA was also entitled to be heard with regard to the Amenity Zone.
5. A minute from the Panel Chair subsequently set out a time frame for the exchange of evidence between AOPA and Council.

Achieving the Intention.

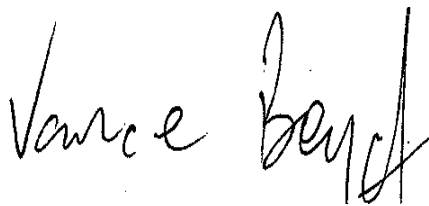
1. We have previously commented that no comprehensive S32 report was prepared for Informal Airports in the Wakatipu Basin. We note however that Mr Barr, in his reply to our submissions regarding the Lifestyle Precinct, referred to the Stage One, Rural Zone S32, Informal Airports report and attached a copy to his evidence. It is therefore reasonable to assume that Council's intention regarding the Rural Amenity Zone is to provide for informal airports, for the reasons set out, in particular the avoidance of excessive procedures such as consent application processes and hearings. Mr Barr also referred to and attached a 2012 report where Dr Chiles, Council's consultant, comments that in Zones other than Rural, a conservative 500m setback cannot generally be accommodated. Dr Chiles suggested a solution to this problem consisting of a combination of setback distances combined with flight number limitations, perhaps augmented by the Ldn limits being combined with an Lae criteria. Dr Chiles report is attached. It will be seen later that the Association favours a reduced setback combined with reduced flight numbers.
2. To give any meaning to the S32 report stated intention it is necessary to reduce the proposed separation distance of 500m. This setback cannot be achieved and a provision with this requirement really confers no benefit at all. We believe that the real protection comes from a restriction on the number of flights and from the need to comply with the noise provisions of S36.5.13 and S36.5.14 and that the separation distance was an additional or ancillary provision, perhaps intended to be helpful.
3. The benefits of having workable informal airport provisions are considerable to our members, and we consider the scale and impact of operations at such airports will be very minor in the context of total Basin aircraft movements and general noise.
4. A recent decision of commissioners, RM180396, grants an application by T. Roberts for an informal airport. (Appealed). At the hearing evidence was received and accepted that there were about 15,000 helicopter movements per annum in the Wakatipu basin. In the year ending June 2018 Queenstown airport recorded a total of 59689 aircraft movements. This number, which has increased since, includes all types of aircraft. The number of fixed wing movements is therefore considerably greater than helicopter movements. Given the number of existing movements, plus over flights and flights to and from locations other than the airport, it can be seen that the basin is already exposed to noise from aircraft and of course additional noise from traffic and rural activities. The Commissioners' comment on this and other matters and a copy of their decision is attached.
5. We estimate that if authorised, total recreational and private movements, to and from Informal Airports would be less than 60 per week. They would have minimal detrimental effect but would enable a sector of the community to continue to enjoy their recreation and means of private transport without the need to apply for a resource consent, the cost of which will probably exceed \$20,000. While the use of informal airports by fixed wing aircraft is considered very important by AOPA the number of such airports and therefore fixed wing flight movements will be constrained by aircraft ability to utilise available runway length. These constraints do not of course apply to helicopters. Most private helicopters are of the less expensive smaller type with a gross takeoff weight of less than 2200kg and are quieter than larger machines used for some commercial purposes.

What we would like.

1. The association respects the views of Dr Chiles but has struggled to see how the distances for low flight numbers, referred to in the noise profile graph require a 500m setback.
2. In case we were incorrectly interpreting his work we sought advice from Mr George van Hout of Acoustic Engineering Services. Mr Van Hout's report is attached. It confirms acceptance of Dr Chiles findings, of our view that a 500 meter setback is conservatively excessive, that our interpretation of the noise/flight movements/distance graph prepared by Dr Chiles is correct and opines that the setback distance for one takeoff and landing per day could be 150m.
3. The current Council proposal allows for two flights = two landings and take offs per day. That equates to 14 per week, 60 per month and 730 per annum. However as these are worthless if a 500m setback cannot be achieved we suggest they be reduced to be below but similar to the numbers allowed in the Roberts decision i.e. 120 PA, 20 per Month, 7 Per week and 1 per day with a separation/setback distance of 150m.
4. We believe this is a reasonable, conservative approach, which will satisfy the needs of our members and the objectives set out by Council.
5. A provision of this nature could be restricted to recreational and private use with the existing proposals retained for general and commercial operations. We note that some other plans have adopted the approach of making special provisions for recreational and private use.
6. We would like Council to seek advice from Dr Chiles regarding a solution to our request.

Hearing.500m

We do not wish to cause further delay by requesting that a hearing be held regarding this matter, although we are prepared to participate in this or any other process the panel may find desirable.



28 January, 2019.