

**APPENDIX
SUMMARY OF SUBMISSIONS MADE
TO SECTION 293 APPLICATION**

Summary of Submissions Received to Frankton Flats section 293 Application notified on 27 November 2004.

24 submissions were received to this Section 293 application. It was notified on 27 November 2004 and submissions closed on 24 December 2004.

The following is summary of the submissions received; a copy of the full submissions made can be obtained from CivicCorp during office hours.

Hans Arnstedt, 82 Spence Road, RD1, Queenstown

Objection to some parts of the proposal for Frankton Flats.

- Heights are the main concern and will have a detrimental effect on the lower slopes of the Remarkables as seen from the state highway.
- 15 m maximum in zones D1, E, and F is too high and should be reduced. Buildings in these zones should be no more than two stories in height; the other zones fronting the state highway should also be reduced to a maximum of two stories.
- Poles or balloons should be erected to show the proposed heights of buildings are seen from the state highway to show the impact on the surrounding landscape.
- The OS buffer zone should have a landscape plan prepared before the hearing, selection of trees is also important to ensure they do not obscure views of the mountains beyond.
- Tomorrow's Queenstown made it clear that the development must blend in with the surroundings and not be obtrusive on the landscape.
- Remarkables Park is a better location for commercial areas than Frankton Flats as it is able to accommodate taller buildings.
- Two commercial areas in short distance from each other is not good planning.

RL and JE Britton, 32 Old School Road, RD1, Queenstown

Opposing the application to amend the District Plan in order to provide for the Frankton Flats special zone.

- That concentrating building in this are will obscure the outstanding natural landscape, in particular the view of the Remarkables and Cecil and Walter Peaks.
- The strip of land of rural land next to the events centre is not positioned in the most appropriate way to protect the iconic face.

- Subdivision of this land is unnecessary given there are other subdivisions that have not been fully utilized.
- Remarkables Park, Lakes Hayes Estate and several other subdivisions within the Wakatipu Basin still have numerous sections still available. There are huge developments taking place to accommodate short term visitors that will eventually be rented out to workers, the market will soon flood with rental accommodation.
- High density building planned for the area will overload the already fragile infrastructure of the Wakatipu. The sewage system is not functioning properly; roading is not coping with the present volume of traffic.
- Large apartment type buildings planned for student and transient works in activity areas E and F will create a ghetto type environment.
- Height of the buildings in E and F is inappropriate for the situation.
- Suggestions that [no] activities in the buffer zone OS other than those already existing.

Gardez Investments Limited, C/- Adrian More, PO Box 5143, Dunedin.

- Oppose the extent of the buffer zone adjacent to the state highway for the reason that there is no need for it to be the same over all its length, seek the buffer proposed in their notified structure plan.
- Oppose the 600m line as the outer control boundary provides adequate protection of the airport in respect of reverse sensitivity issues, seek deletion of this line.
- Oppose proposed outer control boundary (new) as they believe that there is no jurisdiction for the Court to make provision for the boundary as part of the Section 293 application, if the boundary exists it is impossible to make provision for a portion only of the boundary, the appropriate time to consider any alteration to the boundary is when the airport corporation has completed its master plan for the airport including any amendment to all of the boundary. Seeks removal of the all of the proposed new outer control boundary.
- Change Activity Area A from Large format retail/commercial/staff accommodation/offices, to light industrial/staff accommodation. Change B1 from Light Industrial/Staff accommodation to Rural General. Reasons for this include the proven need more land at Frankton to be available for light industrial use and area A is more appropriate and Area B1 is owned by the airport who seek Rural General.
- Opposition of Council's plan provisions as they differ from those proposed by us as they do not provide enough flexibility for the development of a viable village concept and seek the adoption of the plan provisions proposed by Gardez as publicly notified.
- Opposition of the buffer line included in Shotover Park's provisions for the same reason as in bullet point 2 above.

- Oppose the activity areas and activities proposed by Shotover Park as they have carried out extensive consultation with the community and will be calling expert evidence to the effect that the proposed village concept would not be feasible.
- Oppose Shotover Park Limited's plan provisions to the extent they differ from those proposed by us, as they are unnecessary or inappropriate particularly but not exclusively to the extent that they support Shotover Park's proposed structure plan and seek the adoption of the plan provisions as set by Gardez.
- Oppose the activities set by Monaghan Holdings Limited as set out in paragraph 5 of its memorandum as the heavy industrial set would, in some respects have an adverse effect on amenity and would not enable the integrated management of effects and seeks the adoption of the provisions and structure plan proposed by Gardez.
- Oppose riders 37, 39 and 45 from the memorandum from Transit New Zealand as 37 merely restates the provisions of another enactment which has its own independent jurisdiction. Rider 39 is not necessary because there is, in any event, no prospect of a building causing such adverse effects from that side of the state highway. Rider 45 is inappropriate for similar reasons with the possible exception of reflective glare. Gardez seeks the deletions of the riders.
- Oppose the restrictions on activities south of the proposed Northern Airport buffer line by the Airport corporation and seek the adoption of Gardez submissions as A1(b)(i & ii); and B1 (b) (i to iii) (of the submission) and seeks the rejection of the submission of the Queenstown Airport Corporation Limited.
- Seeks that the structure plan be amended to show the internal cross boundary roading links between land ownership and roading links to the State Highway for the reasons that it is necessary to extend and amend the proposed village development as outlined in the charette document and their proposed master plan (to be produced at the hearing) to include land owned by Shotover Park Limited and other landowners. To enable a comprehensive plan for the village, internal roading needs to be specified as do the connections to the State Highway. Seeks the determination of the pattern for internal roading and access and connections with the State Highway and incorporate in the structure plan.

PJ Hensman, PO Box 64, Queenstown

- Submission on behalf of the users of the Frankton Golf Course. Submits that the land zoned for sporting, recreational use is insufficient for the ongoing needs of the community. The Frankton Flats area is the most logical and suitable area for expansion of the Events centre and Frankton Golf Club as it is essential that such sporting areas have sufficient areas to expand in an orderly and cost effective manner.
- Notes and agrees with the educational sub zone provided that residential activities are only permitted as part of the educational facility.

- Seek the alteration of the boundary between zones D1, F and E such that it is parallel to Grants Road and extends to the Southern boundary of Zone B1 and rezone all land west of this new boundary exclusively for recreational use.
- Alter the remainder of proposed zone F to E (Educational residential and short term accommodation).
- Map attached to this submission.

Mark and Julie Hillary, C/- John Edmonds and Associates, PO Box 95, Queenstown.

- Submitter is opposed to the inclusion of an arbitrary line which crosses the submitter's property, resulting in the property being contained within Activity Area F and Area B2.
- Supports the structure plan of Gardez which fully located the submitters property within Activity Area F and opposed Shotover Parks structure plan which includes their property as within a recreational area.
- Requests that community facilities are included on their property and be included in 12.17.3.6 Table 1 as having controlled activity status.
- Requests that light industrial is a discretionary activity on their property.

D & J Jardine, C/- Prain and Associates, PO Box Lyttelton, Christchurch

- Opposition to the proposal because it will adversely affect the operations of the Queenstown airport.
- There will be an adverse effect on the visual amenity of the Frankton Flats, particularly the views from the state highway to the Remarkables.
- Proposal is beyond the scope of the original application forming the basis of the Section 293 application.
- The legal vires for extending the scope are uncertain.
- The proposals are contrary to the existing policies in the Queenstown Lakes District Plan.
- The proposals are contrary to the principles and purposes of the RMA.

Brett Glass, 10 Butel Ave, Arrowtown

- Object to the portion of the development plan that allowed any form of residential development. The area is too close to a major runway of the Queenstown airport.
- The noise associated with the airport will eventually create a situation that has occurred in a number of other similar situations areas the world and will affect the viability of the airport and in the worst case the airport could close.

- The nature of the terrain surrounding the Queenstown airport means that aircraft will fly directly over the proposed development.

Manapouri Beech Investments Limited, C/- Anderson Lloyd Caudwell Limited, PO Box 201, Queenstown

- MBIL supports the intent of the C1 Activity Area and requests its adoption subject to a number of amendments as outlined in the submissions.
- MBIL supports the following paragraph: *“To mitigate adverse effects on the amenities of Frankton Flats, it is necessary to retain some areas of open space free from structures so that landscaping and tree planting can soften views of the development behind”.*
- MBIL supports this resource management issue. However the notes that reference to “the development” should in fact be reference to the Frankton Flats Zone.
- Make changes to Objective 1 and associated policies.
- Make changes to Objective 4 Development form Policy 1 and 2 (QLDC provisions).
- Make changes to implementation methods under QLDC provisions to include the recognizing existing uses within Activity Area C.
- Supporting of zone purpose.
- 12.17.3.1 – remove “and in accordance with the structure plan”.
- Controlled Activities Rule 12.17.3.2 – amend 2nd bullet point and delete “and in accordance with he structure plan).
- Table 1 (QLDC provisions), wants an number of amendments to the table and the addition of a definition for garden centres; some of the non complying activities are too prescriptive.
- Deletion of the zone standard (i) - too prescriptive, not effects based planning, requests deletion of this zone standard.
- Continuous Building Length (QLDC provisions) (a) effect of this rule is non complying activity status for any building over 25m in C1 area. This is too restrictive, and ignores other mitigation methods such as landscaping and existing use rights.
- Building height provisions in the in respect to the submitters property are too prescriptive; seek 8m in their zone.
- Building coverage (QLDC provisions), provisions are too restrictive and unclear, request 50% building coverage for any building within a site in an activity area.

- Nature and scale of Activities (QLDC provisions), the standard conflicts with the intended purpose of the C1 activity area, requests exclusion from this rule.
- Minimum permeable surface (QLDC provisions) 50% is too restrictive, rule is unnecessarily restrictive and should not default to a non complying activity status is not met. Request 25% of the area instead of 50%.
- Airport and state highway noise related measures (QLDC provisions) the heading is misleading as the text does not refer to roading activities – remove “state highway” from the heading.
- Access onto State Highway (QLDC provisions) Request the addition into the provisions showing that existing uses authorized under the Transit Act are allowed.
- Any consequential amendments to give effect to the above submissions.

Elwyn Martin, PO Box 867, Queenstown

- Requests that roads to the development are at least 1.5 to 2m wider than the Glenda Drive development. When large traffic is parked on either side then it will still allow for 2 way traffic.

Milford Sound Flightseeing Ltd – Real Journeys, PO Box 920, Queenstown

- Supports the QAC proposal to extend the Outer Control Boundary from the existing to the proposed.
- MSF supports no residential activities within 600 metres of the airport including the crosswind runway 14/32.
- MSF support the submission forwarded by the Queenstown Milford User Group.
- Reasons for the submission are for QAC to have control over proposed activities or willing within the boundary, the proposed outer control boundary would give QAC the authority to protect the safe operational environment of the airport, specifically in this case the approach and departure areas of the cross wind runway 14/32, and to ensure the development in complementary to the operational capability of the Queenstown Airport.

Monaghan Holdings Limited, C/- Anderson Lloyd Caudwell, PO Box 201, Queenstown.

- Proposed structure plans (all), MHL supports the B2 industrial areas to the south of the subject land as shown on the QLDC's propose structure plan and seeks that the same activity area is extended over the subject land as shown the amended structure plan; opposes the rural general zoning to the south of subject land as proposed by GIL. MHL submits that any buffer between GIL land and the B2 industrial area should be provided for on GIL land, not on the subject land. MHL opposes the Structure Plan proposed by SPL, MHL submits that the SPL proposed structure plan does not achieve

the integrated management of effects or promote the sustainable management of natural and physical resources of the Frankton Flats.

- Objective 4 Development Form Policy 2 (QLDC provisions 12 – 3) and Objective 3 Development Form Policy 2 (SPL provisions). Support of the policy and seek its retention in relation to Activity Area B2.
- Explanation and principal reasons for adoption (QLDC 12 – 4 and SPL provisions 12 – 69). Support paragraph 3.
- Table 1 (QLDC and SPL versions) supports the list of activities as they relate to the B2 Activity Area proposed by QLDC. MHL seeks that those provisions are retained and applied to the subject land as per submission 1.
- Site Standard (ii) Building height (b) (QLDC and SPL provisions) 12m – MHL supports this site standard and seeks its retention.
- Site Standard (iii) Building coverage (QLDC and SPL provisions) support this site standard as it relates to Activity Area B2 and acknowledge that the standard could be amended to avoid ambiguity.
- Zone standard (iii) Building height (c) it is unclear why the height specified for the zone standard is lower than the height specified for the Site Standard. It is submitted that this provision is either deleted or amended so that the height specified is greater than that specified for the site standard.
- Zone Standard (iv) Building coverage (QLDC and SPL provisions), MHL supports this zone standard as it relates to the B2 activity area as proposed by the QLDC.
- Zone standard (v) minimum permeable surface (QLDC provisions) MHL supports this zone standard as it relates to the B2 activity area as proposed by the QLDC.
- Zone standard (vi) Noise (c) QLDC provisions, MHL supports this zone standard as it relates to the B2 activity area as proposed by the QLDC.
- Nature and Scale of Activities of non residential activities (QLDC provisions) MHL supports this zone standard as it relates to the B2 activity area as proposed by the QLDC.
- Consequential amendments – seeks any consequential amendments to give affect to the above submissions and MHL's overall wish to use the subject land for heavy and light vehicle transport and all ancillary activities

Jeff Norton, 17 Gray Street, Queenstown

- Solar orientation, buildings that are design with passive solar have substantially less heating requirements than those with out. The roof pitch and orientation to true north would allow solar panels and other solar heating equipment to be installed.
- Site layout, orientation and density, where appropriate, site layout need[s] to have the longest side facing north to allow buildings to max solar access.

Higher density buildings (like terraced buildings) to be joined at east and west walls enabling north open to the sunshine, high and large scale buildings to have parking or green space surrounding them to create area to prevent shadowing on to neighboring buildings.

- Acoustic insulation of buildings, all buildings to achieve acoustic levels as if they are within airport boundary plus up grade isolation to best practice levels.
- Energy efficient building and acoustic design overlap and specifying construction will have a positive effect on both (additional to acoustic guidelines). All external wall structure (as complete item) should have a R3 value. All windows to be double glazed with low – e. Concrete floor perimeter insulation of R1. No penetrations for recessed down lights in insulated ceilings.

Queenstown Airport Corporation Limited, C/- Macalister Todd Phillips Bodkins, Po Box 392, Wanaka.

- Opposes that part of Activity area F (visitor accommodation/short term residential/offices and commercial) north of the Collins and Hillary properties and Grants Road extension and east of Grants Road to the south of the 600m line and seeks to retain the existing Rural G zoning on such land.
- Oppose that part of E (educational/residential/short term accommodation) east of Grants Road to the south of the 600 metre line and seeks to retain existing Rural G zoning on such land.
- Oppose that part of B2 (industrial) north and east of Grants Road, west and North of the Hillary and Collins properties and south of area F and seeks to retain existing Rural G zoning of such land.
- Oppose that part of B2 (industrial) north and east of Grants Road, west and north of Hillary and Collins properties and south of area F and seeks to retain existing Rural G zoning of such land.
- For the sake of completeness any rezoning that may be proposed in respect of any part of Grants Road.
- Any reference to B1 (light industrial) be amended to B2 (industrial).
- Oppose any rezoning of the submitters land currently zoned industrial in the POPDP.
- On pages 12-14 make the following changes to activity areas B2:
 - (a) Commercial activity with a gross floor area greater than 500m² per retail outlet – change classification to discretionary activity.
 - (b) Commercial activity with a gross floor area equal to or less than 500m² per retail outlet – change classification to controlled activity.
 - (c) Premises licensed for sale of liquor – change classification to permitted activity.

- Rule 12.17.5.1 (iii) Building coverage change building coverage in B2 zone to 75%.
- Rule 12.17.5.2 (iv) Building coverage – change building coverage in the B2 zone so that there is no restriction on area.
- Rule 12.17.3.3 (a) Renumber as section numbers are inconsistent, (new (v) amend reference to 30 metres to 10 metres).
- Rule 12.17.5.2 (viii) Delete reference to B2 zone.
- In all other respects the application by QLDC is supported.
- Gardez application – Seeks changes to the activity areas, policies and objectives, rules and assessment matters as per the submission on the Queenstown Lakes District Council application subject to changes the subject of the submitter’s submission on the QLDC application.
- Shotover Park Limited Application:
- Structure Plan
 - (a) The submitter opposes the location and route of the proposed trail noting that general support is given for a trail through the zone but not in the location proposed.
 - (b) Rezone areas shown as B1 to B2.
 - (c) Rezone area south of Grants road extension proposed to be zoned REC – Recreation to B2 (industrial).
 - (d) Opposed any rezoning of the submitters land currently zoned industrial in the POPDP.
 - (e) Make provision for inclusive of Outer Control Boundary as shown on the Queenstown Lakes District Councils proposed structure plan.
- Environmental Results anticipated – paragraph 12.16.4, final bullet point – reword as follows “recognition of the Queenstown Airport operational requirements.
- Rule 12.17.3.3 (iii) Change reference to 15 metres to 10 metres.
- Rule 12.17.3.4 (ii) Propose that this is deleted.
- Rule 12.17.3.6 – Table 1 Make the following changes applicable to activity area B2:
 - (a) Commercial activity with gross floor areas greater than 500m² per building.
 - (i) Change reference to “building” to “retail outlet”;
 - (ii) Change classification of activity to discretionary activity.

- (b) Delete reference to rule for commercial activities with gross floor area between 50m² and 100m² per building.
 - (c) Commercial activities with a gross floor area less than 500m² per retail outlet:
 - (i) Change reference to commercial activities with gross floor area of 50m² or less per retail outlet;
 - (ii) Change classification to controlled activity.
 - (f) Delete reference to separate rule for garden centres.
 - (g) Premises licensed for the sale of liquor – change classification to permitted activity.
- Rule 12.17.5.1 (iii) Building coverage; amend to provide for building coverage in activity area B2 of 75%.
 - Rule 12.17.5.2 (iv) Building coverage, amend provision so that there is no limitation on building coverage in activity areas B2.
 - Amend rule 12.17.5.2 to be consistent with what is sought in application of QLDC as supported by the submitter.
 - In all other respects the submitter abides by the decision of the Court in respect of the balance of the matters as sought by the applicant.

Queenstown Golf Club Inc, C/- Anderson Llyod Caudwell, PO Box 201, Queenstown.

- The Queenstown Golf Club identifies areas of land at the airport end of Grant Road as an excellent location for a nine hole golf course and other outdoor sporting activities for the following reasons.
- Flat land – easily accessible golf course.
- Close to existing golf course.
- Good neighbor for the airport.
- Excellent facility for rapidly growing Frankton/Remarkables Park residential area.

Queenstown Lakes District Council, C/- CivicCorp, Private Bag 20077, Queenstown

- The Queenstown Lakes District Council seeks a number of wording and numbering errors to it's own Section 293 application and structure plan. This was presented to the Council for authorisation prior to lodging of the submission.

Queenstown Milford User Group, PO Box 105, Wanaka

- Supports the QAC proposal to extend the Outer Control Boundary from the existing to the proposed.
- QMUG supports no residential activities within 600 metres of the airport including the crosswind runway 14/32.
- QMUG support the submission forwarded by the Queenstown Milford User Group.
- Reasons for the submission are for QAC to have control over proposed activities or willing within the boundary, the proposed outer control boundary would give QAC the authority to protect the safe operational environment of the airport, specifically in this case the approach and departure areas of the cross wind runway 14/32, and to ensure the development in complementary to the operational capability of the Queenstown Airport.

Remarkables Park Limited, C/- Brookfields, PO Box 240, Auckland

- RPL oppose the applications made by Gardez Investments Limited and QLDC.
- The provisions proposed by GIL and QLDC:
 - (a) Can be modified so that they better achieve the purpose and principles of the Resource Management Act 1991 (the Act);
 - (b) Are not the most appropriate means of assisting the respondent in fulfilling its functions, powers and duties under the Act;
 - (c) Are not in full compliance with the requirements of sections 31, 32 and 74 of the Act;
 - (d) Do not meet the requirements of sections 74 and 75 of the Act in relation to the preparation of district plans, in particular the requirements to implement integrated management, especially to take into account of the Partially Operative District Plan provisions for Urban Growth (Section 4.9.3 Objective 6 for Frankton) and the Remarkables Park Zone;
 - (e) Can be modified sot that they better achieve the objectives and policies of the Partially Operative District Plan;
 - (f) Can be modified so that they better achieve the resource management outcomes sought for the Frankton Flats area and the Wakatipu basin;
 - (g) Are inconsistent with the provisions of the proposed plan, the proposed regional plan; Air, the proposed regional plan: Water, the Regional Policy Statement for Otago and the LTCCP.
- The provisions are inconsistent with Section 12.10 Remarkables Park Zone which recognizes this zone as implementing the dual node or hub referred to in Tomorrows Queenstown.

- Provisions are inconsistent with the Council's growth projections and urban development for the Frankton areas as set out in the Council Community Plan.
- There has been no adequate consideration and assessment of the wider economic effects of the provisions on existing commercial areas.
- The emphasis in the policy statement and explanation is on industrial activities not retail activities; however large format retail activities are similar to industrial activities in nature.
- The provisions will not achieve the objectives and policies of Section 14, Transport, are consistent with the sustainable management of the transport infrastructure and will have an adverse effect on the roading network.
- The adverse landscape and visual effects of the development on the environment will be more than minor. The provisions do not recognize and provide for the protection of the existing landscape.
- The location of education facilities should be located outside of the proposed Queenstown Airport Outer Control Boundary.
- The rules not provide for an appropriate and consistent landuse activity buffer to the north of the airport.
- Consultation has been inadequate.
- There has been no opportunity to take into account important strategy documents such as the Transportation and Park Study, Education report, or the Airport Master plan.
- The rules do not provide for an appropriate landuse buffer beside State Highway 6.
- RPL considered the existing infrastructure is inadequate for cope with the proposed development of the land.
- The proposed provisions are not supported by a Section 32 analysis which justifies the additional zoning of the land for the proposed activities, assesses the effects of the proposed activities on existing activities in the Remarkables Park Zone or on the infrastructure that supports the development in the Frankton Flats area and its relationship to the wider environment.
- RPL supports objective 3 and related policies 3-5 of GIL's and the Council's provisions to the extent that they are not inconsistent with the SPL provisions.
- Consideration needs to be given to Activity Area C2-3 bring used substantially as part of the buffer areas to protect the open landscape and views at the entrance to Frankton and Queenstown from SH6.
- Seek that the objectives policies and rules involving Activity Areas C, D, E, F and REC (as provided for in the SPL structure plan) be amended so that this areas not be used for retail or visitor accommodation, but instead for low rise

industrial, education or short term accommodation (for example, student accommodation) as appropriate, and limited to strictly retail ancillary to those purposes, and with appropriate infrastructure. For this purpose a new structure part will be provided as part of the evidence.

- That the rules need to be amended to provide for appropriate and consistent land use activity to the north of the airport.
- That the rules be amended to provide for an appropriate landuse buffer beside State Highway 6.
- That the proposed amendments to Objective 3, Policies 3-5 as set out in the applications by GIL and Council be made to the extent they are not inconsistent with the SPL provisions.
- Such other amendments as are necessary to give effect to this submission.

Shotover Park Limited, C/- Brookfields, PO Box 240, Auckland

- The provisions proposed by GIL and QLDC:
 - (a) Can be modified so that they better achieve the purpose and principles of the Resource Management Act 1991 (the Act);
 - (b) Are not the most appropriate means of assisting the respondent in fulfilling its functions, powers and duties under the Act;
 - (c) Are not in full compliance with the requirements of sections 31, 32 and 74 of the Act;
 - (d) Do not meet the requirements of section 75(1) and (2) of the Act;
 - (e) Can be modified so that they better achieve the objectives and policies of the Partially Operative District Plan; and
 - (f) Can be modified so that they better achieve resource management outcomes sought for the Frankton Flats area.
- The objectives, policies and rules contained in the SPL application better protect the panoramic vistas of Outstanding Natural and Features, in particular the western (front) face of the Remarkables, when viewed from the State Highway adjacent to the Frankton Flats zone. SPL is prepared to support, in the Structure Plan and in the Table 1 at rule 12.17.3.6, as follows:
 - The location of the 600 metre “Northern Airport Buffer Line” shown on the Structure Plan provided by GIL and QLDC;
 - Buildings in Activity Areas C1 and C2 as Limited Discretionary Activities;
 - Residential activities as a non complying activity in F;
 - Deletion of the row “commercial activities with gross floor areas greater than 500m² per building and less than 1000m² per building;

- Commercial activities in buildings with gross floor areas less than 500m² as non complying activities in A other than eating establishments ancillary to the commercial activities;
 - Health and day care facilities as Controlled Activities in C2 and D1, and non complying activities in D2;
 - Premises licensed for the sale and consumption of liquor as Controlled Activities in C2;
 - Offices to be controlled activities in C2.
- SPL supports the use of Activity Area A for large format retail activities. Activity Area A is located adjacent to the existing (and future) industrial land at Glenda Drive and proposed industrial land to the south of Activity Area A. Large format retail activities are an appropriate and efficient use in Activity Area A because:
 - Large format is compatible with the existing and proposed industrial zone activities because both activities have amenity values that are different from (and of generally lesser quality than) permanent residential and village retail; and
 - Both activities attract trucks and other large vehicles, and can be served by the existing roading network and by the Eastern Arterial road without potential conflict with other activities.
 - Activity Area A and the proposed height for this area are such that they are not in line of sight from the state highway that is in conflict with views of the eastern face of the Remarkables, and therefore can absorb larger and less architecturally interesting buildings.
 - The area is set back from the SH by more than 100m and accordingly is in a location which together with appropriate landscaping will not have an effect on the visual approach to Queenstown and Frankton with respect to building or parking areas.
 - The area is already being established for that purpose (by the granting of the non notified consent for the establishment of a Placemakers Large Format Retail store adjacent to Activity Area A).
 - SPL has identified various matters in the applications of GIL and the QLDC which it opposes. These are as follows:
 - The density of developed proposed in Activity areas D1, D2, E and F and residential activities in Activity Area D2 should not be a permitted activity because of the potential for reserve sensitivity effects in respect of the principal use of Activity Area A for large format retail uses. Residential Activities in Activity Area D2 should be a discretionary activity.
 - The GIL and QLDC provisions encourage large format retail activities (commercial activities with a GFA of greater than 500m²) in activity areas D1 and F, where large format retail is listed as a limited

discretionary activity. Further, GIL and QLDC encourage small format retail as a permitted activity. Further, GIL and the QLDC encourage small format retail (commercial activities with a GFA of less than 500m²) in Activity Areas C1 – C3 and F. SPL opposes any encouragement of large format retail areas other than Activity Area A, and opposes small format retail in activity areas D1, D2, C1 – C3, E and F, for a number of reasons outlined in the submission.

- SPL oppose the Structure Plan submitted with the GIL application and particularly as it relates to the zoning of the SPL land for light industrial activities. SPL supports the QLDC application which zones the SPL land principally for large format retail, commercial, staff accommodation and office activities.
- SPL opposes the use of Activity Areas B1 for “heavy” industrial activities (panel beating, spray painting etc) in visible proximity to the Eastern Arterial Road. These activities should not be encouraged in this Activity Area and should be prohibited. In Activity Area B2, such activities should be controlled activities, not permitted activities, to manage the potential visual impact of such activities when viewed from nearby areas.
- SPL neither supports nor opposes any proposed relocation of the Air Noise Boundary or the Outer Control Boundary. SPL has requested information as to the basis for the new boundaries however such information has not yet been provided to SPL and accordingly SPL must reserve its position with respect to this matter.
- SPL considers that where the application by QLDC differs from the application by SPL, the SPL application as modified by this application should be preferred.
- SPL supports Objective 3 and related policies of GIL’s and the QLDC’s provisions to the extent they are not inconsistent with the SPL provisions.
- SPL will accept a maximum height of 9 metres in Activity Areas A and B1-2 provided that facades and signs can be extended to 12 metres beyond 300 metres setback from the SH. The maximum height for the balance of the Frankton Flats Special Zone should be limited to 6 metres.
- SPL supports the use of Activity Area REC for education, light industrial and industrial activities to the extent that they are appropriate and consistent with land use buffers established south of the airport.
- SPL will modify its own Table 1 and provisions in accordance with this submission.
- All references in this submission are to the SPL structure plan unless otherwise specified.
- The proposed objectives, policies and rules in the applications by GIL and the QLDC should be rejected or modified to the extent set out in Part 3 of this submission, and the proposed objectives, policies and rules in the application by SPL should be adopted with modification as set out in Part 3 of this submissions.

Transit New Zealand, C/- Chapman Tripp, PO Box 993, Wellington

- Contrary to Section 293 of the Act
- Contrary to the purpose and principles of the RMA
- Contrary to sound resource management practice
- The notified changes conflict with integrated management
- The notified changes have not been the subject of a “Section 32” analysis.
- The notified changes have not been the subject of adequate stakeholder or community consultation, and submission.
- The objectives, policies and rules of the notified changes fail to adequately address issues of relevance to the sustainability of the source of SH6 and SH6A.
- The notified changes are inherently incapable of delivering on those objectives and policies, in any event, by reason of:
 - The insular and piecemeal nature of the rezoning, including its failure to be appropriately integrated with provisions of the District Plan such as those pertaining to the State Highway and transportation issues.
- The inherent inadequacies of rules, and other provisions of the notified changes in regard to the control of effects on the state highway resource.
- Resource Management Issue (ii), the explanation to this issue does not recognize the State Highway network and does not address the potential impact of the traffic generation on the State Highway resource. This is representative of the entire notified changes where access to and from the state highway, reverse sensitivity issues and “sustainability of the network” are recognized throughout objectives and policies, but there is no consideration of the impact of the traffic generated by the development on the State highway.
 - For any variation that could be developed in place of the Section 293 to appropriately provide for recognition of the state highway; and
 - For protection of the State highway from adverse effects generated by the change of land use within the rezoned land.
 - Requirement for any rezoning to appropriately provide for the achievement of Objective 2 and Policy 2 through a range of measures to avoid, remedy or mitigate the adverse effects on the State Highway network of (a) connections between any rezoning development and the state highway and (b) the additional transport demands along the state highway, including through financial contributions. The setting aside of land area and identification of a funding mechanism for State Highway corridor upgrading.

- Under Objective 3 it is necessary to test whether the development is in the most appropriate location (through s32), confirm whether a plan change or variation is justified, then develop plan objectives which take due account of working towards Transit's statutory objective.
- The pedestrian and cycle facilities have not been developed at all on SH6 and along SH6A are largely undeveloped and will need significant upgrading to avoid, remedy or mitigate the adverse effects of the development.
- The policy does not specify whether a new arterial or an upgrading of the existing SH6 is envisaged to provide a link to Remarkables Park.
- There is no indication on how Policy 5 is to be achieved; integration of the proposed notified changes development with the state highway resource will potentially require widening and upgrading of the transport corridor.
- The 2 apparently principal points of access of the changes are at Grant Road and Glenda Drive; the development will necessitate an upgrade of these intersections.
- A strategic assessment is required to adequately mitigate the effects of access demands from the development.
- Consideration also needs to be given to management of access demands from properties on the opposite side of SH6 in respect to any highway or intersection upgrading and how crossing demands from these properties are also managed.
- Policies associated with Objective 6 include requiring "setback areas and buffer zones from the state highway..." However, there is no setback required from the state highway from within activity area C1. This is inconsistent with both the Objectives and Policies of the FFSZ and those relating to the adjacent OS activity area, no site and zone standards within the OP area.
- The potential development of some of the land is provided for within the objectives, policies and rules. However the lack of rules to guide the level or intensity of development could serve to seriously undermine the effectiveness of the buffer. The buffer is one way of protecting the State Highway from the reverse sensitivity effects from development of the FFSZ.
- It is feasible that resource consent could be granted for a building as a non complying activity, the potential to erode the OS activity area is exacerbated by most of the objectives and policies relevant to buildings rather than their use.
- Objective 7 – to provide sufficient land for large format retail facilities – this is an example of a significant issue, the scale and intensity of the development that would be allowed under the notified changes and the failure of the notified changes to address sustainability impacts beyond the proposed zone.
- Objective 8 seeks to achieve high levels of accessibility, safety and convenience for people traveling to, from or within the zone. Traffic

generation estimated from the notified changes will reduce the level of service on the State Highway network required by Transit New Zealand.

- The policy fails to provide any guidance on the form of the roading hierarchy in order to provide efficient, effective and sustainable access to and from the zone and within the zone.
- In any rezoning the Council should address the specific provisions the following should be addressed:
 - Development (in consultation with Transit) of a comprehensive transportation strategy to identify how best to achieve efficiency and sustainability of the State Highway in the context notified changes.
 - Consideration of the outcome of that strategy in the development of revised zone provisions, including as to the nature, scale, intensity and location of landuses and activities within any revised zone.
 - Inclusion in any variation to affect any revised zone of provision of changes to designations for the State Highway network and other associated changes to the District Plan to ensure integrated management.
 - Rule 12.17.4 allows for controlled activities to be considered without written approval of affected parties. Landscaping especially within the OS buffer area be subject to further consideration for operational reasons.
 - The status of the Outline Development is ambiguous, and lacks clear purpose. The ability to lodge an Outline Development Plan in a controlled activity is only provided within the provisions relating to Council reserving control over controlled activities. There does not seem to be a purpose for providing an outline development plan.
 - Lack of certainty as to the scale and nature of residential issues within C1, C2 and C3 activity areas. As permitted activity, residential developments will not be subject to any assessment if the site standards are met. The potential for greater development than what is anticipated by the rules must be considered, especially as Gardez seeks a substantially higher coverage coupled with a reduction in private open space for smaller residential dwellings.
- Signage seems to be no opportunity for Transit to consider the effects of signage from the State Highway.
- Glare, seems to be no opportunity for Transit to have any input on potentially dangerous light spill from the proposed development.
- Require specific rules and objectives to actively discourage vehicle generation (through restrictive parking standards).
- Deletion of large format retail activity to actively discourage vehicle generation or provision of this activity until such time as the State Highway network has been upgraded to accommodate such traffic.

D N Hudson Turnbull, 24 Kawarau Place, Frankton.

- To be heard on the following issues – The Notified Provisions 12, Future provision of Secondary Education facility, Building heights and site density, future provision of a pedestrian walkway encircling the whole Flats, future provision of a state highway.
- Seeks decisions which take into account the wider community of the Wakatipu Basin and the future needs of the future needs of that community. Decisions which acknowledge the importance of this parcel of land to the community and the vital visitor industry.
- Seeks conditions which minimize the impact of this zone on the beauty and magnificence of this unique landscape. Conditions which allow for people's aspirations of a "complete" community.

Air Wakatipu, PO Box 194, Queenstown.

- Oppose the proposed Frankton Flats Special Zone.
- Seriously affected by this proposed development and our ongoing viability as an Aero Club is greatly compromised by what is proposed.

Wakatipu High School, C/- The Principal, Private Bag 50080, Queenstown.

- The Wakatipu High School Board considers that the high school will need to be related to a more appropriate location in the medium term and has identified the Frankton Flats special zone as the most suitable (and potentially the only available) site for a district secondary school.
- The board wishes to ensure that the proposed activity area E identified in QLDC's Proposed Structure Plan (24-11-04) specifically allows for a secondary school in priority and in addition to any other complementary educational facility that may be permitted.
- Activity Area E is sufficiently large in terms of land area to accommodate a Secondary school together with any other complementary educational facility that may be permitted in that Activity Area.
- Any other activities that may be complemented within Activity Area E (such a residential development or small scale commercial activities associated with any planned educational activities associated with any planned educational facilities) be restricted until such time as the educational facilities have been authorised and construction commenced.
- The WHS Board wishes the Court to impose the following: rules relating to the proposed educational activity area E that specify the provision of a secondary school as a priority land use within that Activity area and such rules and conditions that may be necessary to give effect to 2(a) to (c) above.

Wakatipu Environmental Society, PO Box 697, Queenstown

- Has concerns that the Frankton Flats Special Zone proposal is not integrated into a wider plan for all of the Frankton Flats area;
- Concerns with regards to the erosion of the buffer along Sh6;
- Concerned at the height of the buildings within the proposed zone;
- Have concerns that the future expansion of the airport has not been adequately considered;
- Have concerns that the traffic issues have not been properly integrated into the wider planning scheme;
- Concerned that the timeframe for this proposal is quite tight and the pace is proceeding quite quickly;
- Wish for the Court to consider how the proposal can fit into a wider plan for the Frankton Flats area. The wider plan shall be determined by the QLDC.

Wakatipu Trails Trust, Private Bag 50072, Queenstown.

- Objective 9 – Transport networks – addition of the following policy, “To provide Trail Access through Frankton Flats that meets the criteria required by the Wakatipu Trails Trust in forming National, Regional and Local linkages. The establishment of this Trail is to be done in consultation with the Wakatipu Trails Trust.”
- Objective 9 – Design and Implementation – addition of the following policy, “To provide for Trail geometry that is consistent with the needs of the users, both recreational and commuter, and that is done in consultation with the Wakatipu Trails Trust”.
- 12.17.6 (g) Pedestrian and Cycle Access ways, Addition of the following policy “The extent to which there is provision for a 6m wide Te Araroa Trail sited in accordance with the criteria and specifications of the Wakatipu Trails Trust.”
- The Trails trust submission includes a map of the preferred location of the route.