

FORM 5: SUBMISSION

DISTRICT PLAN REVIEW

2663

QUEENSTOWN
LAKES DISTRICT
COUNCIL

Clause 6 of First Schedule, Resource Management Act 1991 – as amended 30 August 2010

TO // Queenstown Lakes District Council

YOUR DETAILS // Our preferred methods of corresponding with you are by email and phone.

Name: the Aircraft Owners and Pilots Assn of New Zealand

Phone Numbers: Work:

Home: 03 4426062

Mobile: 0274-343275

Email Address: rvcnb@extra.co.nz

Postal Address:

c/- Vance Boyd

11 Antrim Lane, 9300, Queenstown.

Post code:

9300

PLAN CHANGE // To which this submission relates to:

Chapter 2 & Waketipu Basin.

I ☒ Do not gain an advantage in trade competition through this submission.

*I ☒ Am ** directly affected by an effect of the subject matter of the submission:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition. ✓

* Delete entire paragraph if you could not gain an advantage in trade competition through this submission.

** Select one.

SPECIFIC PROVISIONS // Of the proposal that my submission relates to are:

See Attached



MY SUBMISSION IS //

Include whether you support or oppose the specific provisions or wish to have them amended; and the reasons for your views.

2663

Attached



I SEEK THE FOLLOWING FROM THE LOCAL AUTHORITY //

Give precise details:

Attached

I

Do

wish to be heard in support of my submission.

I

Will

consider presenting a joint case with others presenting similar submissions.

SIGNATURE

Signature (to be signed for or on behalf of submitter) **

[Handwritten Signature]

Date

05 September 2018.

** If this form is being completed on-line you may not be able, or required, to sign this form.

Queenstown Lakes District Council: Proposed District Plan: Chapter 24 Wakatipu Basin – Informal Airports.

Submission from the Aircraft Owners and Pilots Association of New Zealand.

Introduction

1. The AOPA (NZ) represents the interests of over 900 private recreational aviators in New Zealand. International Associations represent this class of aviator in 66 countries. AOPA provides a unified voice for pilots in New Zealand by building relationships with Government and regulatory bodies to ensure members' views are represented, with the aim of preventing any increasing costs and restrictions being placed on private and recreational flying. Many members reside or fly in the QLDC area. Members fly fixed wing, helicopter and glider aircraft.
2. This submission relates to the policy framework for informal airports within the Wakatipu Basin Rural Amenity Zone and the Wakatipu Basin Lifestyle Precinct. In particular, this submission responds to the error notified on Thursday 9 August 2018 relating to the Wakatipu Basin Variation, and the omission of specific activities within the Precinct (Table 24.2). As a consequence of Rule 24.4.28 (informal airports in the Precinct) not being notified with the rest of Chapter 24, the AOPA did not have the opportunity to submit on the broader policy and standards framework applicable to informal airports in Chapter 24. Given this, the AOPA submits now on the implications and interrelationship between Rule 24.4.28, the policies supporting informal airports in the Basin, and the standards applicable to informal airports. The AOPA is of the opinion that from an aviation perspective there are significant similarities between the Basin and other Rural Zones in the QLDC District and therefore the management of informal airports across those different zones requires an integrated and consistent approach. This is also assumed to be the intention of the Council given a section 32 analysis on informal airports relating to the Rural and Rural Lifestyle Zones was published as part of Stage 1 in August 2015, but no section 32 analysis on this topic was undertaken as part of the Stage 2 Basin Variation (despite this covering the same area of land as previously included in Stage 1). The association has a keen interest in ensuring that informal airports are a permitted activity in the Wakatipu Basin and that plan provisions applying standards for informal airports are practical and realistic. This desire has been heightened by policies aimed at discouraging private aircraft from using Queenstown airport. The Aero Club has been removed from the airport, there is no hanger space, limited parking space and landing and parking fees are very high. Compared to other districts in New Zealand the needs of recreational aviators are poorly met in the current planning framework.

Chapter 24 and section 32 analysis on informal airports

3. There appears to be no Section 32 report relating to informal airports in the Basin in support of Chapter 24 as notified in Stage 2 of the Plan Review. We assume that the reasoning relating to control of informal airports in the Wakatipu Basin Rural Amenity Zone is similar to that expressed in the Rural Zone S32 report as part of Stage 1 of the Plan review. That report stated:

“This proposed policy promotes informal airports as an important part of recreational activities within the district as opposed to the current plan provisions which are silent regarding this activity.”

4. The report goes on to explain that aircraft operators should not have to endure the resource consent process to enable the establishment of informal airports, subject of course to not causing unnecessary annoyance to neighbours.
5. Council is to be commended for this approach, particularly as it relates to recreational and low use fliers. In the past some have applied for resource consents and while these have usually been granted the process has been very costly and the outcome uncertain.
6. The lack of a S32 Report relating specifically to the Wakatipu Basin Zones means that we are unsure why informal airports are proposed to be a conditional permitted activity in the Amenity Zone but a discretionary activity in the Basin Lifestyle precinct, and furthermore whether the standards applicable to permitted informal airports (25.5.14) are appropriate for the Basin / Precinct Zones.
7. The problem with the proposed provisions as currently drafted is that they completely fail to provide any practical benefit to recreational aviators. In the Amenity Zone the proposal is that there should be a 500m set back from any other zone or the notional boundary of any neighbouring residential dwelling. The problem with that approach is that it is generally impossible to comply with it. Almost all, if not all, dwellings in the Wakatipu Basin Rural Amenity Zone and the Precinct are closer than 500m to each other. The position is that this, coupled with the discretionary classification of the Precinct means that there is no practical benefit to including informal activity airport rules in Chapter 24.
8. We have looked at the District Plans of 22 South Island councils to see how the QLDC proposals compare. While some have no restrictions on aircraft operations at all, the majority allow landings and take offs as long as the relevant zone noise standards are complied with. Two districts make special provisions for recreational private landings while two others have similar provisions to those proposed for the Amenity Zone. Two district plans were confusing to the point that it was hard to conclude what was allowed.
9. We were particularly interested in areas within the jurisdiction of the Waimakariri district Council and the Dunedin City Council. Both of these councils have semi rural land with relatively close together lifestyle residential properties similar to those that exist within the Wakatipu Basin. These are principally surrounding Kaiapoi and Rangiora and in the Taieri basin. In the Waimakariri district, there are no specific restrictions for fixed wing aircraft as long as the zone noise limits are complied with. Special provision is made for helicopters as follows:

31.12.1.14

The night weighted sound exposure (Edn) day-night average noise level (Ldn) and night time maximum sound level (L_{\max}) generated from a helicopter landing site as measured at or within the boundary of any site shall not exceed:

- a. Business 1 and 2 Zones: Edn 100Pa2s and 65dBA Ldn.
- b. Business 3 Zone: Edn 1000 Pa2s and 75dBA Ldn.

- c. Residential Zone: Edn 3.5 Pa2s and 50dBA Ldn and between 10pm and 7am 70dBA L_{max} .
- a. At the notional boundary of any dwellinghouse in the Rural Zone: Edn 3.5Pa2s and 50dBA Ldn and between 10pm and 7am 70dBA L_{max} .

31.12.1.15

Helicopter landing site noise shall be measured and assessed in accordance with the provisions of NZS 6807:1994 "Noise Management and Land Use Planning for Helicopter Landing Sites".

10. The Dunedin City Council has prepared a generation two Proposed District Plan. It provides for helicopters as follows:

[https://www](https://www.dunedin.govt.nz/development/4533) **Rule 4.5.3.3 Helicopter Landings**

- a. Helicopter landings must not exceed 10 landings on the same site within any calendar year, except two days of unlimited landings on the same site are allowed within any calendar year.
- b. Helicopter landings must only occur during daylight hours.
- c. The following activities are exempt from this standard:
 - i. helicopter landings for emergencies by police, fire service, ambulance, or for search and rescue; and helicopter landings that meet the noise performance standards for the relevant zone

A member of the planning team at Dunedin City Council confirmed that a similar provision is intended to be provided for fixed wing aircraft.

Recreational fliers have no desire to annoy members of the public or their neighbours. They just want to enjoy their activity without the need to apply for resource consents unnecessarily. The usual level of activity is low and very low when compared to other aviation activity in the district.

Relief sought

11.

The Association submits that as in other districts, the noise limits prescribed in Chapter 36, table three would by themselves achieve this objective in the Wakatipu Basin, to protect residential amenity. We understand that this table would apply by virtue of 36.3.2.9

- 12. An alternative but more complicated approach would be to apply the Amenity Zone proposals to the entire Basin with the minimum setback distance reduced to 150m.

This distance can usually be achieved and would, at 2 movements per day, provide in conjunction with the Chapter 36 requirements, an adequate level of protection. The following table was

provided to council in 2007 by noise expert Mr V.C. Goodwin.

Time period	Maximum number of flight movements ^{note 1}									
Daily limit ^{note 2}	2	5	9	14	22	34	55	86	138	216
Maximum on any one of 7 days ^{note 3}	4	10	18	27	43	69	109	173	276	432
7 day week total ^{note 4}	14	37	63	95	152	241	382	605	968	1512
Distance ^{note 5}	80m	100m	120m	140m	160m	180m	200m	225m	250m	300m

Instructions Select the relevant row for a given weekly total helicopter movement number, or a daily movement number, and look up the distance in metres in the table which is equal to or is the next highest value for the maximum number of flight movements found in the relevant row.

For example, for a 7 day weekly total of 100 movements, select the "7 day week total" row and find the value in that row which is equal to or closest above 100. The nearest value is "152" and the corresponding distance is 160m. Therefore if the helipad is greater than 160 metres from the notional boundary of the nearest house on another site, it will probably not exceed the 50 dB L_{DN} daily limit. Distances and movement numbers can be interpolated in this rough guide.

It relates to how a "squirrel" helicopter would comply with the limit of 50db L_{dn} at various distances from adjacent property buildings. It shows that two movements per day could be accommodated at a distance of 80m while at 300m 216 daily movements would still comply. Fixed wing movements could presumably be greater as the noise allowance is 55 dB L_{dn} which because of the logarithmic scale is significantly more. On this basis the separation requirement of 500m must be seen as excessive.

Council has also received a report from Dr Steven Chiles and referred to this during the Rural Zone process. This report opines that an AS350 helicopter (arguably at the noisier end of the scale) could undertake 20 movements per day, seven days a week, and the noise contour would extend to 500m in one direction and 200m in another. At two movements per day the graph within the report shows that the noise contour would extend 80m in one direction and about 110m in the other. These two experts' reports to council contain remarkably similar findings and are in line with other noise evidence produced to support resource consent applications. Dr Chiles states that the noise contour could be reduced further by steeper approach and departure angles. He also comments on the position of a small number of fixed wing daily movements by suggesting a 95dB LA_e limit and a 55 dBA L_{dn} limit could achieve the noise objective with a setback distance of 100m. He mentions that a 500m setback cannot be accommodated in some zones.

11. The association is keen to work with council to arrive at a formula which allows limited scale recreational aviation to be recognised as an activity which is compatible with life in the Wakatipu Basin. Although the current proposals do not allow for that we believe the objective is achievable.

Should a hearing be held we wish to be heard in support of our submission; in the meantime we are prepared to take part in any discussion that may result in a workable solution.

From: Vance Boyd
To: [pdp submissions](#)
Subject: AOPA Submission Chapter 24 PDP
Date: Thursday, 6 September 2018 11:01:48 AM

Good Morning,

I have realised that an error exists in section 6 of our submission forwarded to you yesterday.

The words :

informal airports (25.5.14) should say informal airports (24.5.14).

Regards

Vance Boyd.