

Resource Management Submission Form

Under the Resource Management Act 1991

Submitters Details

Submitters Full Name/Company/Trust:	Mackenzie District Council
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* Our default method of corresponding with you is by email and phone. Alternatively, if you wish to receive correspondence by post (including any decision) please provide a postal address and tick the relevant box above.

Address For Service (if different from the submitter's details)

Company:	
Contact Name:	
Email address*:	
Postal Address*:	
Tick if postal address is preferred method of correspondence*:	☐
Phone number (Day):	
Phone number (Mobile):	

Details of application being submitted on

Applicant's name:	Heliventures New Zealand Limited
RM reference:	RM240144
Description of proposed activity:	Land use consent for an aviation development and associated visitor accommodation and function/conference activities.

My submission

Please indicate whether you support, oppose or are neutral to the application or specific parts of it (Tick):

☒ Support ☒ Oppose ☐ Neutral

We support some parts of the application and oppose others

My submission is (the particular parts of the application I support or are opposed to are):

The Council supports the development of aviation activities, along with those activities that are genuinely ancillary to the aviation activities, which due to their nature and scale will not detract from, or conflict with the operation of the airport and aviation activities in the wider area.

The Council opposes the nature and scale of the proposed accommodation units.

The reasons for my submission (the reasons I support or oppose the particular parts of the application above):

The Council is the owner and operator of the airport. Its interest is therefore in ensuring that development¹ within the Airport Zone does not constrain or compromise the efficient operation of the airport and protects its intended role and function as an airport.

The Pūkaki Airport is located 3km north of Twizel and is 284km from Christchurch. In the late 1980s Mackenzie District Council became involved in airfield operations. It was in 2003 the Mackenzie District Council concluded the purchase of 220 hectares at Pūkaki to develop the airfield and the surrounding area for hangars and facilities. From 2000 to 2010 a subdivision was developed adjacent to the airfield itself, and properties sold to generate funds for costs such as runway maintenance and to fund airport operations and potential expansion. The intent was not to create visitor accommodation or general urban activities at the airport.

Aviation activity levels at the Airport have increased significantly post Covid. In the last 12-month period up to and including September 2025, 7013 aircraft movements were recorded, an increase of 69% over the previous 12 months.

There are currently 10 aviation-related businesses operating out of the airport.

Aviation and Related Ancillary Activities

The Council fully supports the key elements of the proposal that relate to development of the application site for aviation development, and considers that this is consistent with the zoning, and anticipated and established land uses in this airport area. This includes the helicopter hangar, workshop, operational equipment area, and related reception, storage and staff spaces. The Council considers that these aspects of the proposal are consistent with the intent of the zoning under the operative plan – being to provide for a range of aviation facilities and activities, including both existing and future development. It also aligns with the purpose, character and values of the zone¹ which are anticipated under Plan Change 30 (PC30).

A key part of this is that the focus of the zone is for airport activities and various aviation-related activities which support or complement airport activities (AIRPZ-O1). The main focus of the proposal aligns with these outcomes and are supported by the Council.

There are other ancillary components to the activity that the Council do not consider to be an issue, such as:

- use of the meeting room by other parties. This allows for efficient use of this space, and it is not likely to become a dominant use; and
- ancillary retail activities as these will be complementary to and support the main aviation activity.

¹ Section 9- Airport Zone, 3.1 Zone Statement

The concerns that the Council has with other aspects of the proposal are outlined below.

Visitor Accommodation

The application also includes a substantial “accommodation” component, which would allow for six accommodation units, to be used for staff, customers or visitors, totaling 548m² in floor area. This represents over a third (36%) of the overall built form and excludes additional outdoor living areas (upper floor decks and ground floor patio areas) associated with the accommodation.

The Council is firmly opposed to the use of accommodation for visitors, which is neither ancillary too, nor associated with the main helicopter business proposed. The scale proposed would allow 6 separate groups of visitors to stay on site, with no ties to the main on-site activity or the aviation focus of the wider zone.

The Council is concerned that the operation of aircraft creates a number of potentially adverse effects, including noise, dust, wind, fumes and safety hazards for people. While these effects are anticipated within the zone (i.e. they arise from activities that are permitted), they can result in conflict with activities that are sensitive to these effects, including visitor accommodation. This can result in guests complaining or objecting to these effects, or safety incidents occurring, which may then lead to the airport operations (and other approved, lawfully established or permitted activities) being compromised, constrained or curtailed as a result of the sensitivity of the visitor accommodation.

The Council does not consider that registration of a no complaints covenant on the titles of the application site is sufficient to manage potential reverse sensitivity effects. As a covenant is tied to the title, it will apply to the landowner. The Council is unclear how it will be able to effectively be applied to guests staying on site. Even setting aside whether a guest lodging a complaint would or would not be breaching the covenant, if a complaint is made, the local authority must investigate and act on the complaint regardless of the covenant (i.e. the local authority is not bound by the no complaints covenants). Ultimately, the Council considers that guests utilising the visitor accommodation are likely to have higher amenity expectations. This is likely to mean that guests will be sensitive to the actual, potential or perceived adverse environmental effects generated by the airport and other approved, lawfully established or permitted activities within the zone and lead to reverse sensitivity effects regardless of any covenant.

A no complaints covenant would also not address the risks arising from more people being present in the zone who will be unaware of the safety hazards arising from legitimate airport operations.

The applicant also proposes to mitigate noise from aviation activities (which could give rise to reverse sensitivity effects) through the acoustic insulation of units so that noise from the airport is “not offensive or objectional”. The Council is concerned that noise may not be at a level that is considered “offensive or objectional” (or, using the language in clause 16 of the RMA that more specifically applies to noise, “unreasonable”,) but might still be considered annoying or intrusive by guests, even with this insulation. The insulation also does not mitigate noise experienced in the outdoor living areas proposed. There is a high level of risk that guests might complain about such noise, with such complaints leading to the airport and other aviation activities within the zone having to respond to these complaints through changes to, or constraints on their operations. As such, the Council does not consider the acoustic insulation to be sufficient to avoid the potential for reverse sensitivity effects to arise.

In addition to potential reverse sensitivity effects, the Council is concerned that the proposed visitor accommodation would detract from visitor accommodation offerings in Twizel township and undermine the Plan framework in regard to where visitor accommodation is anticipated. Visitor accommodation in

Twizel township is located in, or near to commercial areas where activities that support visitor accommodation offerings are also located, e.g. food and beverage outlets, entertainment activities and recreation areas. By contrast, the visitor accommodation proposed would not be close to supporting activities and would draw away from the visitor accommodation offerings in the township. In addition, other than at peak visitor times of the year the proposed visitor accommodation would likely take away from accommodation in Twizel township and therefore undermine their viability, with flow-on effects on the vibrancy of the areas it is located in. Neither the operative Plan, nor the proposed Plan anticipates the use of the Airport Zone for the type of visitor accommodation being contemplated, but does provide for it in other, more appropriately located areas.

Finally, the Council does not consider that the establishment of other visitor accommodation activities in the zone justifies granting of consent for this proposal. Just because a precedent has been set, does not mean the precedent should be followed. The lack of objectives and policies in the operative plan, and the written approvals gained at the time, contributed to the establishment of the existing visitor accommodation. Concerns about the potential impact of visitor accommodation unrelated to airport operations is an issue that PC30 has specifically sought to address and granting this aspect of the consent would therefore exacerbate an identified issue that was sought to be rectified through PC30. This is outlined in the s32 for PC30 as follows:

The presence of small freehold titles at the Pūkaki (Twizel) site has resulted in development pressures and the establishment of development which is not provided for by the current District Plan i.e., motel development not related to aviation activities. The lack of objectives and policies resulted in a situation where there was no guidance for decision makers to assess the proposed activities against the intent of the District Plan. This resulted in a situation that due to the applicants having written approvals the effects of the proposals were considered to be less than minor, resulting in Council granting consent for activities which would otherwise not be anticipated in an airport zone²

While PC30 was notified after this application was lodged (and thus the rules in the plan change relating to the Special Purpose Airport Zone (AIRPZ) do not have immediate legal effect,) the objectives and policies do have legal effect and must be had regard to under s104(1)(b)(vi) and considered under s104D(1)(b)(iii) alongside the objectives and policies of the operative Plan. In this instance, the operative Plan does not contain objectives and policies specific to the Airport Zone. While some of the provisions in PC30 are under appeal, the objectives (AIRPZ-O1 and AIRPZ-O2) are not. They can be given significant weight.

Importantly, these reflect that it is anticipated, moving forwards, that the use of land within this zone is managed so that the efficient use and development of airports is not constrained or compromised by incompatible activities establishing within the AIRPZ (AIRPZ-O2.3). Visitor accommodation which is not linked in any way to the purpose of the zone – i.e. for airport activities and other aviation-focused activities (per AIRPZ-O1) is considered to be incompatible with the purpose of the zone and contrary to AIRPZ-O1 and AIRPZ-O2.

As a consequence of the potential reverse sensitivity effects, and the provisions of visitor accommodation in an area where it is not anticipated, the Council considers that the visitor accommodation aspect of the proposal is contrary to Strategic Directions ATC-O3, ATC-O6 and UFD-O1.

² Mackenzie District Plan: Plan Change 30 Section 32 Report: Special Purpose Zones Variation 2 to Plan Change 23, Variation 3 to Plan Change 26 and Variation 3 to Plan Change 27, 5 November 2024, Para 5.15.

Similarly, the Council considers the visitor accommodation aspect of the proposal to be contrary to the direction in the Canterbury Regional Policy Statement to:

- consolidate growth in and around existing urban areas as per Objective 5.2.1(1) and Policy 5.3.1(1)(a) – as the visitor accommodation will be unrelated to the airport activities and located separate from the existing urban area; and
- locate and design development so that it functions in a way that avoids conflicts between incompatible activities (Objective 5.2.1(1)(i) and Policy 5.3.2(2)(b));

For completeness, the Council considers the establishment of visitor accommodation would breach condition 2.6(a) of the covenant on the land title applying to the site. As such, even if the resource consent is granted to allow for this activity, it may not be able to be given effect too because of the covenant.

Overall, the Council considers that the use of any accommodation units for visitor accommodation should be precluded.

Staff and Customer Accommodation

Even if the visitor accommodation use is precluded, however, the Council would be concerned with the number/scale of units being retained and used for staff and customer use. Under the proposed Plan (accepting that these rules do not have legal effect), limits apply to residential units, staff accommodation and aviation related visitor accommodation – being 150m² of gross floor area combined. The current application is more than 3 times this level, and is expected to be greater than necessary to provide accommodation “at short notice”, and in circumstances where this need arises due to capacity issues with local accommodation or for operational reasons (being the intention stated for this in the application). The Council considers that there is a high risk that the number of units proposed would end up being used on a broader basis than suggested by the application (e.g. as permanent long-term residential units) and become a more dominant use of the site, given the number and proportion of the built form.

The Council supports some provisions for on-site accommodation for staff or customer (or contractor) use, but at a reduced scale or that does not extend beyond that necessary to provide on-site accommodation at the short notice suggested. In particular, the Council does not wish to see on-site accommodation of the suggested scale being a permanent feature, given it is not a focus of this zone, and there are residential zones which are intended to provide for general living options.

Functions

The proposal also includes the use of the hangar for conferences and functions, limited to one per week and between the hours of 8am and midnight. It is also stated that these activities “will be managed so that guests cannot physically enter the operational part of the airport.”

The Council is not opposed to the use of the hangar for this purpose, provided it can be undertaken in a manner that does not compromise the operation of the airport or its role and function. Because of this, the Council is concerned about:

- the frequency proposed; and
- how the activity can be managed so that guests do not interfere with airport operations and the health and safety of guests is not compromised.

With respect to frequency, the Council is concerned that allowing for this activity in the hangar up to 52 times per year may result in this use becoming a key focus, and there is greater risk that this would

conflict with the purpose of the zone. The Plan (through PC29) provides for temporary events as a permitted activity, up to 6 times per year (TEMP-R2.2). The Council considers it reasonable to provide for a higher number of events than this permitted level, but considers one per week to be excessive and contrary to the purpose of the zone. The Council consider that a restriction on the total number of events provided on an annual basis would be more appropriate to maintain flexibility for the applicant, while also ensuring that this additional use of the hangar does not become a primary use of the hangar or the site, nor create conflicts with the operation of the airport.

With respect to the potential for this part of the proposal to interfere with airport operations and create health and safety risks, the Council notes that the applicant has proposed a condition stating that “functions must be managed so that guests cannot physically enter the airport operational area.” The Council considers that more detail is required regarding how this is to be achieved; and that this should be broadened so that it is not just about restricting physical access, but also more generally ensuring that functions do not interfere with airport operations, and that health and safety of guests is ensured. This would include, for example, matters such as traffic movements and parking and overall management of functions. It suggests that a management plan, outlining how functions are to be managed to avoid conflict between guests and airport operations and maintaining health and safety, should be required, and that an additional review condition be included to allow for the number of functions and details of the management plan to be reviewed to deal with any adverse effects arising from functions.

My submission would be met by the Council making the following decision (give precise details, including the parts of the application you wish to have amended, and the general nature of any conditions sought):

- Removal of the visitor accommodation portion of the land use consent.
- Reduction in the size of accommodation and/or maximum building occupancy provided for staff accommodation and aviation-related visitor accommodation, for example to the permitted thresholds in proposed rules AIRPZ-R4 and AIRPZ-R5.
- A reduction of the limit on functions at the site that are not related to the aviation activities to an annual limit of 20, and the requirement for a management plan to be prepared outlining how functions are to be managed to avoid conflict between guests and airport operations and maintain health and safety, and submitted to Mackenzie District Council’s Planning Manager for certification that the management plan is appropriate to address conflict; and a review condition that specifically allows for the number of functions and details of the management plan to be reviewed to deal with any adverse effects arising from functions.

Declarations

Please indicate whether or not you are a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (tick):

☐ I am a trade competitor ☒ I am not a trade competitor

If you are a trade competitor, please indicate whether or not are directly affected by an effect of the subject matter of the submission that

- (a) Adversely affects the environment; and
 (b) Does not relate to trade competition or the effects of trade competition (tick):

☐ I am directly affected ☐ I am not directly affected

Please indicate whether or not you wish to be heard at the hearing in support of your submission (note you will only be notified of a hearing if you have indicated you wish to be heard) (tick):

☒ I wish to be heard ☐ I do not wish to be heard

If others make a similar submission, I will consider presenting a joint case with them at a hearing (tick):

☐ Yes ☒ No

Please note ALL information provided in this submission will be made publicly available I understand

☒ I understand

Signature of Submitter (or person authorised to sign on behalf of the submitter)*

Date 20 October 2025

- *If signing on behalf of a trust or company, please provide additional written evidence that you have signing authority.
- *A signature is not required if you make your submission electronically.



Signature of Submitter
 (or person authorised to sign on behalf of the submitter)*

Date 20 October 2025

Note to submitter

If you are making a submission to the Environment Protection Authority, you should use form 16B. The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.

If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.