

Submission

On Plan Change 30 to the Mackenzie District Plan

By Heliventures New Zealand Ltd



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General Information

This is a submission on Plan Change 30 to the Mackenzie District Council

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1.0 Introduction

This is a submission made on behalf of Heliventures New Zealand Limited on Plan Change 30 to the Mackenzie District Plan.

2.0 Executive Summary

The submitter is a helicopter company that has lodged a resource consent application to develop their land at Pukaki Airport. The development includes a helicopter hanger and associated facilities, along with staff, client and visitor accommodation. The visitor accommodation will be used when the accommodation is not being used by staff or clients and will provide a supplementary and sustainable financial return that will assist in financing the significant capital investment need for the helicopter hanger and associated facilities.

The submitter accepts that incompatible activities can constrain and compromise the safe and efficient functioning of airports. However, they consider that Plan Change 30 fails to recognise that commercial visitor accommodation is a key, ancillary and complimentary component of many airports, providing airport users with accommodation close to where they need it. While Plan Change 30 provides for aviation related visitor accommodation, it does so in an unnecessarily restrictive manner, limiting its total gross floor area to 150m² in combination with any residential and staff accommodation. This effectively forecloses a combined residential, staff and aviation related visitor accommodation facility. Accordingly, this submission opposes in part Plan Change 30, with the opposition in relation to its provisions that restricts commercial visitor accommodation.

While the submitter's resource consent application has not yet been determined, it provides a useful example as to how an airport activity can be suitably provided on site in tandem with staff, client and commercial visitor accommodation. It is clear from their application that the dominant component of the activity is the helicopter hanger and associated facilities, with the staff, client and visitor accommodation being ancillary and complimentary to the overall activity.

The Section 32 RMA report does not contain sufficient information to warrant the highly restrictive approach of Plan Change 30 to residential, staff and visitor accommodation and does not include:

- any expert evidence or economic analysis
- evidence in the way of significant and ongoing complaint history
- in depth consultation with affected landowners

- detailed analysis of the issue
- consideration of alternative methods of managing the issue.

The approach of Plan Change 30 to commercial visitor accommodation also non-sensical given that it enables approximately 238 people to be accommodated at the airport with no restrictions to address reverse sensitivity matters. It also goes against the Council's decisions to grant consent to three visitor accommodation activities at Pukaki Airport and the fact that airports around New Zealand and internationally include visitor accommodation. Further, the fact that Pukaki Airport is designated provides Council with the ultimate veto of any development in the event reverse sensitivity issues become an issue.

The submitter seeks to amend the objectives, policies, rules, standards and associated definitions of Plan Change 30 to ensure a suitable level of residential, staff and visitor accommodation are enabled. While full details of the amendments sought will be set out in our planning evidence, this submission sets out some initial amendments that the submitter would like as a minimum. This includes enabling residential, staff and visitor accommodation as a permitted activity, so long as it does not exceed more than 50% of the building's gross floor area. It also includes a default restricted discretionary activity status, with matters of discretionary that guide the assessment of the application. Further, standards are proposed to avoid reverse sensitivity effects including a no complaints covenant and a management plan. This approach is demonstrated by way of a Section 32AA RMA assessment to be more effective and efficient at managing constraints on airport activities and encouraging development than the approach proposed in Plan Change 30.

3.0 Background

The applicant operates a helicopter aviation business. They offer a variety of services including:

- Agricultural Services

Aerial weed spraying, fertilizer application, seeding, wilding pine control, fire lighting, frost protection, mustering and pest control.

- Commercial Services

Firefighting, live animal capture, precision lifting, snow raking, survey work, venison recovery

- Other

Scenic flights, transfers, weddings, hunting and emergency

The business has a base in Oamaru airport and currently rents a hangar at the Pukaki-Twizel Airport. They have operated out of the Pukaki-Twizel Airport for several years and are the only helicopter operator to permanently operate out of that airport. As such they have played an important role in providing agricultural, commercial, recreational and emergency helicopter services in the area. They now want to offer local customers in the Pukaki-Twizel area their full range of services. To achieve this, they need a permanent base at the Pukaki-Twizel Airport that provides sufficient hangar, storage, operational and accommodation facilities. As such, they purchased the site and lodged a resource consent application on 10 September 2024, which is described in more detail below. The application is still being processed.

3.0 Description of the land to which the submission relates

3.1 Site Description

The land to which the submission relates (hereafter the site) is located 15 and 17 Harry Wigley Drive, Pukaki, and is legally described as Lot 30 Deposit Plan 386968 held in Record of Title 378660 and Lot 31 Deposit Plan 386968 held in Record of Title 378659. The site is situated at the northern end of Pukaki Airport, which is located 3 km north of Twizel. The location of the site is indicated in **Figure 1**. A close-up aerial photo of the site is provided in **Figure 2**.



Figure 1 – The site's location is illustrated by a red outline (Source: Canterbury Maps Viewer).



Figure 2 – A close up aerial photograph of the site. The boundaries of the site are indicated by a red line (Source: Canterbury Maps Viewer).

The site has a combined area of 3,249 m² and has a largely rectangular shape. The site is currently vacant except for the temporary storage of helicopters and other equipment. Legal and physical access to the site is from Harry Wigley Drive.

The site is subject to easement instrument 7671529.9, attached as **Appendix 1**, which consists of a no-complaints covenant in respect of any development or activities undertaken by Mackenzie District Council.

3.2 Surrounding Environment Description

The Pukaki Airport is a small airport serving Twizel and the Pukaki area. It consists of a sealed runway and taxi area. Flights from the airport are primarily limited to flights associated with agriculture, sightseeing and recreation.

While Pukaki Airport contains 53 separate allotments, development has been slow to occur and there is only a dozen lots that have been built on to date.

Buildings mostly consist of hangars but there are also house-hangers and three visitor accommodation activities. The latter includes the Pukaki Air lodge, Sky Suites and ‘Plane in Pukaki’.

The land to the south of the site consists of a vacant allotment. Harry Wigley Drive adjoins the site to the west beyond which exists a landscape strip and State Highway 8. A taxi lane adjoins the site to the east.

4.0 Description of the Proposed Development

4.1 General

The development that the submitter is seeking resource consent for consists of the establishment and operation of a helicopter business and associated activities. The new facility will provide the applicant with a comprehensive base at the Pukaki Airport for their expanding helicopter business.

4.2 Built Form

A two-storey building is proposed with a maximum height of 8.54m, a footprint of 1,104m² and a gross floor area of approximately 1,508m². Refer to Figures 3 and 4 for renders of the proposed development, Figure 5 for the site plan, and Figures 6 and 7 in **Appendix 2** for the floor plans.



Figure 3 – Render of the development as viewed from the northeast



Figure 4 – Renders of the development as viewed from the north-west



Figure 5 – Site layout plan

4.3 Proposed Activities

The proposed building will accommodate the following activities:

Activity	Floor Area (m ²)
Helicopter hanger	645
Workshop	84
Operational equipment area	46
Storage space	19
Office	22
Staff room	28
Staff locker	9
Meeting room	19

Scenic flight reception area	61
Office for scenic flight reception	8
Toilets for scenic flight reception	19
Sub-total	960
Accommodation units:	548
• One four-bedroom unit	
• Two two-bedroom units	
• Three one-bedroom units	
Total	1,508

Table 1 – Schedule of proposed activities and their gross floor area

4.4 Accommodation

The accommodation will be available for staff, customers and visitors.

In terms of staff, the applicant needs the ability to accommodate staff at the airport to:

- avoid expensive accommodation costs
- avoid capacity issues with local accommodation
- ensure operational flexibility.

Staff are regularly conducting helicopter operations in the Mackenzie Basin and often need accommodation at short notice. Accordingly, it would be ideal if they can base themselves on site.

The applicant's customers are also proposed to be accommodated on site. The applicant has a range of customers that need the ability to stay at the site at short notice. These include customers associated with the applicant's pest control, rescue, firefighting, animal recovery, conductor stringing, conservation, hunting and scenic viewing operations.

The applicant also wants the flexibility to use the accommodation for visitors when the accommodation is not being used by staff and customers. Accommodation for visitors will only be available when it is not already being utilised for staff or customers. All the visitor accommodation units will include acoustic insulation to mitigate adverse noise effects.

4.4 No Complaint Covenant

The applicant proposes a consent condition requiring that a no complaints covenant is registered against the sites Record of Titles. The objective of a covenant will be to ensure that any owners or occupiers of the visitor accommodation units will not complain or object to

any permitted aviation activities at the airport. This will augment the existing no complaints covenant that the sites are already subject to under Easement Instrument 7671529.9 that relates to aviation activities conducted by Mackenzie District Council.

5.0 The Relevant Provisions of Plan Change 30

The specific provisions of Plan Change 30 that this submission relates to are the Airport Special Purpose Zone (AIRPZ) and its objectives, policies, rules, standards and associated definitions that relate to commercial visitor accommodation, aviation related visitor accommodation, staff accommodation and residential units and residential activity.

6.0 Submission

6.1 General

Plan Change 30 seeks to address the issue of incompatible activities in the AIRPZ constraining or compromising airport activities. The submitter accepts that incompatible activities can constrain and compromise airport activities. However, Plan Change 30 fails to recognise that commercial visitor accommodation is a key and complimentary component of many airports. It provides travellers with convenient accommodation at the start or end of their journey or when using airport services. While Plan Change 30 provides for aviation related visitor accommodation, it does so in an unnecessarily restrictive manner, limiting its total gross floor area to 150m² in combination with any residential and staff accommodation. Not only does this unnecessarily constrain the extent to which aviation related visitor accommodation can be provided on site, it does so in a manner which effectively forecloses it being provided with residential activities and staff accommodation. Accordingly, this submission opposes in part Plan Change 30, with the opposition in relation to its provisions that restricts commercial visitor accommodation.

6.2 The Proposed Development

The submitter's proposed resource consent application provides a useful example as to how airport activity, in this case a helicopter operation, can be provided on site in tandem with staff and visitor accommodation. It is clear from their resource consent application that the key aspect of the activity is the helicopter hanger and associated facilities, with the staff and visitor accommodation being ancillary and complimentary to the overall activity. For instance, when staff or clients are not using the accommodation, it will be available for visitor accommodation. The income generated from the visitor accommodation will provide a

sustainable economic return to help finance the significant capital expenditure required for the aircraft hangar.

6.3 Managing Reverse Sensitivity Effects

The submitter has closely considered the potential reverse sensitivity effects of the proposed visitor accommodation facility in preparing their resource consent application particularly given that their own operation would potentially be most affected by reverse sensitivity effects. In other words, it is in their own best interest to ensure that potential adverse effects are managed appropriately.

In terms of potential reverse sensitivity effects on the adjacent aviation gas facility to the north of the site, it is considered the setback of the site and building over 30m from this facility will largely avoid any fumes effecting visitors at the site. Further mitigation is provided by the fact that most of the time visitors will be located indoors and that the refuelling facility is infrequently used.

In terms of potential reverse sensitivity health and safety effects, the site will be fenced so that visitors cannot access operational areas of the site or adjoining land.

In terms of potential reverse sensitivity noise effects, this will be mitigated by the need to comply with Rule NOISE-R17 (Plan change 29) that requires all new buildings within 500m of the AIRPZ to meet minimum noise reduction standards, install mechanical ventilation and provide certification from a suitably qualified person that this has been provided. This approach aligns with the Mackenzie District Aviation Strategy contained in the operative District Plan that acknowledges that treatment of noise sensitive activities is an acceptable solution.

Further, as stated above, the easement instrument 7671529.9 on the site's title already provides a no-complaints covenant in respect of any development or activities undertaken by Mackenzie District Council. A no complaints covenant is proposed as a standard in relation to aviation activities conducted on other land within the airport. This would complement the easement instrument by applying to other airport activities, not conducted by Mackenzie District Council. This will help ensure that any owners or occupiers of the site cannot complain about existing legally established aviation activities, the aviation activities permitted by the MDP or the designation.

It should also be noted that many of the people that stay in the site's accommodation will be staff or customers who will inherently accept that they are staying at an airport. For instance, staff are staying at the site as it is their place of business. Customers are staying there as the business is delivering a service for them. Similarly, anyone booking visitor accommodation at the airport will be aware that it is an operational airport and therefore will expect the normal adverse effects associated with airports. Visitor accommodation customers are also temporary, and most are not expected to stay more than a few days. This also mitigates the potential for reverse sensitivity issues as some customers will be reluctant to complain if they are leaving shortly. Aircraft enthusiasts are also likely to stay at the airport so that they can view aircraft taking off and landing. They are not people who will complain about aircraft activity as they are there to experience it.

6.4 Visitor Accommodation at Other Airports

There are numerous examples of commercial visitor accommodation at airports around New Zealand and internationally. The nearby Omarama airport includes visitor accommodation and houses within and adjoining the airport. As commercial visitor accommodation at airports primarily trades off customers using the airport it is unnecessary to impose limits regarding customers not using the airport. It is nonsensical for most people to book visitor accommodation at the airport unless they are using the airport, as airports are located well out of town. While we acknowledge some people could book visitor accommodation without using the airport activities, this would be unusual and likely only to be in times when there is an extreme shortage of other accommodation in the area.

6.5 Section 32 RMA Report

We consider that there is in sufficient evidence in the Section 32 RMA report to warrant the highly restrictive non-complying activity status for commercial visitor accommodation and the limits placed on residential, staff and aviation related visitor accommodation. The report is not supported by:

- any expert evidence or economic analysis
- evidence in the way of significant and ongoing complaint history
- in depth consultation with affected landowners
- detailed analysis of the issue and alternative approaches to managing the issue.

A request to Mackenzie District Council under the Local Government Meetings Act has revealed that they have only every received four complaints in respect of airport activities. While we have not been provided with the details of those complaints, it strikes us as a very

low number of complaints and certainly does not justify a non-complying activity status for commercial visitor accommodation. A non-complying activity status could be justified if there was significant on-going complaints and evidence of those complaints constraining legally established airport operations. However, that does not appear to be the case.

It also strikes us as somewhat unusual to require a non-complying activity consent for commercial visitor accommodation when Mackenzie District Council has issued resource consents at Pukaki airport for three separate visitor accommodation activities accommodating a total of 26 people. The non-complying activity status for commercial visitor accommodation proposed in Plan Change 30 is therefore contrary to Council's earlier decisions on these resource consents.

Further, there are approximately 53 lots at the Pukaki airport with permitted activity rights under Plan Change 30 for a house, staff accommodation, and aviation related visitor accommodation up to 150m², equating to 7,950m² of floor space for accommodation. This could accommodate, along with the consented visitor accommodation, approximately 238 people. Therefore, it is non-sensical that so many people are enabled to stay at the Pukaki airport, including permanent residents, staff and aviation related visitor accommodation, but other people cannot stay there temporarily due to a perceived risk that their presence will constrain or compromise airport activities.

In respect of consultation, paragraph 6.7 of the Section 32 RMA report acknowledges that the feedback received during the consultation on the Special Purpose Zones was limited. Paragraph 6.8 of the Section 32 report suggests that there were divergent views on this matter, stating:

“Mixed views on visitor accommodation and whether it should be restricted to those flying in and out, or more widely provided for. Some respondents supported use of the zone for seasonal accommodation due to very high demand in Twizel, while others noted short term accommodation and small hotels were not supported and should be non-complying.”

The consultation alone therefore does not provide a strong basis for the non-complying activity status for commercial visitor accommodation.

The Section 32 RMA report also does not acknowledge the fact that the Pukaki Airport is designated¹ and therefore that Mackenzie District Council has power under Section 176(1)(b) RMA to prevent any development that would hinder the operation of the airport. This provides an ultimate veto of any development in the event reverse sensitivity issues become an issue.

With these matters in mind, it is considered that the Section 32 RMA report lacks an evidential basis for the proposed restrictive approach to residential, staff and commercial visitor accommodation.

7.0 Decision Sought

The submitter seeks to amend the objectives, policies, rules, standards and associated definitions to ensure that a suitable level of residential, staff and commercial visitor accommodation are enabled. The submitter acknowledges there may be several ways of achieving this and that they will provide more detailed amendments in their planning expert's evidence. The amendments proposed below are suggested as a minimum and initial suggestion. In summary, the submitter proposes to amend the provisions of Plan Change 30 to ensure that any residential, staff, visitor accommodation development is subject to:

- A higher gross floor space threshold.
- Has a default restricted discretionary activity status, with matters of discretionary that guide the assessment of the application.
- A no-complaints covenant registered on the site's record of title that would prevent owners and occupiers complaining or objecting to airport activity.
- A management plan to ensure that customers are made aware of the no complaints covenant and kept safe from aircraft activities.

Note that Rule Noise-R17 of Plan Change 29 addresses reverse sensitivity noise effects.

The submitter's initial amendments requested to the provisions of the AIRPZ are:

AIRPZ-R3	Residential Unit / Residential Activity	
	Activity Status: PER Where: 1. The use is contained within an airport building and the maximum combined	Activity status when compliance is not achieved with R3.1-DIS Restricted Discretionary

¹ Designation No. 69 in the Operative Mackenzie District Plan

	<p>total gross floor area of any residential, staff accommodation and <u>aviation related</u> visitor accommodation activity does not exceed <u>50% of the building's total gross floor area</u>.<u>150m²</u>; and</p> <p>2. <u>Compliance with AIRPZ-S10 is achieved.</u></p>	<p>Matters of discretion:</p> <ol style="list-style-type: none"> 1. <u>The extent to which the residential activity compliments or support airport activities on the site.</u> 2. <u>The extent to which the residential activity forecloses the ability of the site to accommodate airport activities.</u> 3. <u>The extent to which the residential activity constrains airport activities on other sites.</u> 4. <u>Measures to avoid or mitigate adverse effects on airport activities.</u>
AIRPZ-R4	Staff Accommodation	<p>Activity Status: PER</p> <p>Where:</p> <p>1. The use is contained within an airport building and the maximum combined total gross floor area of any residential, staff accommodation and <u>aviation related</u> visitor accommodation does not exceed 50% of the building's total gross floor area <u>150%</u>².</p> <p>2. <u>The maximum occupancy does not exceed six staff.</u></p> <p>_____</p>
		<p>Activity status when compliance is not achieved with R4.1 – R4.2: DIS</p> <p>Restricted Discretionary</p> <p>Matters of discretion:</p> <ol style="list-style-type: none"> 1. <u>The extent to which the staff accommodation compliments or support airport activities on the site.</u> 2. <u>The extent to which the staff accommodation forecloses the ability of the site to accommodate airport activities.</u> 3. <u>The extent to which the staff accommodation constrains airport activities on other sites.</u> 4. <u>Measures to avoid or mitigate adverse effects on airport activities.</u>
AIRPZ-R5	Aviation Related Commercial Visitor Accommodation	

	<p>Activity Status: PER</p> <p>Where:</p> <ol style="list-style-type: none"> 1. The use is contained within an airport building and the maximum combined total gross floor area of any residential, staff accommodation and aviation related visitor accommodation does not exceed <u>50% of building's total gross floor area of any building 150m²</u>; and 2. <u>The maximum occupancy does not exceed six guests per night</u> 2. <u>Compliance with AIRPZ-S10 is achieved.</u> 	<p>Activity status when compliance is not achieved with R5.1 – R5.2: DIS</p> <p>Restricted Discretionary</p> <p>Matters of discretion:</p> <ol style="list-style-type: none"> 1. <u>The extent to which the visitor accommodation compliments or support airport activities on the site.</u> 2. <u>The extent to which the visitor accommodation forecloses the ability of the site to accommodate airport activities.</u> 3. <u>The extent to which the visitor accommodation constrains airport activities on other sites.</u> 4. <u>Measures to avoid or mitigate adverse effects on airport activities.</u>
AIRPZ-R9	Residential Visitor Accommodation	
	Activity Status: NC	
AIRPZ-R10	Commercial Visitor Accommodation	
	Activity Status: NC	

Standards

AIRPZ-S10	Reverse sensitivity	Activity Status where compliance not achieved:
	<ol style="list-style-type: none"> 1. <u>A legal instrument is registered against the site's Record of Title to ensure that the owner(s) or occupier(s) of the site cannot make formal complaints about, object to, or submit against, any adverse effects from aviation activities or aviation support activities at the Pukaki Airport that are either lawfully established, permitted by the Mackenzie District Plan or its</u> 	NC

	<p><u>successor, or included as part of the airport designation.</u></p> <p>2. <u>For any visitor accommodation activities, a management plan is prepared and submitted to Mackenzie District Council for acceptance that explains how visitor accommodation guests will be informed of the no complaints instrument registered on the site's Record of Title and how guests will be kept safe from airport activities.</u></p>	
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8.0 Section 32AA RMA Assessment

A brief Section 32AA RMA assessment is provided below to compare the proposed approach of Plan Change 30 in constraining residential, staff and visitor accommodation with that of a more enabling approach.

OPTIONS	<ol style="list-style-type: none">1. Constrain residential, staff and visitor accommodation.2. Enable more residential, staff and visitor accommodation with limits.
OPTION 1	CONSTRAIN RESIDENTIAL, STAFF AND VISITOR ACCOMMODATION
Benefits	Environmental: None Economic: There will be less potential risk of constraining airport activity. However, that risk can be mitigated by appropriate controls. Overall, the economic benefits will be LOW
	Social: None
	Cultural: None
Costs	Environmental: None Economic:

	<p>Developments such as the proposed will be discouraged. It may not be financially viable to proceed with the proposed development due to the lack of income from visitor accommodation. The submitter will incur substantial land holding costs and may have to sell the property at a loss. Discouraging development such as the proposed will likely discourage new investment. There will be opportunity costs:</p> <ul style="list-style-type: none">• In not accommodating more people at the airport as the increased population would have helped support the economic viability of other activities.• In that aircraft operators will not be able to offer flight and accommodation packages.• In that the increased levels of visitor accommodation would have wider economic benefits. <p>Aircraft operators would have to pay somewhere else for their staff to stay.</p> <p>Overall, the economic costs are considered to be MODERATE TO HIGH in a local context.</p>
	<p>Social: The opportunity cost of not providing increase accommodation in the district will have a low to moderate adverse effect through the loss of social connections.</p>
	<p>Cultural: None</p>
Efficiency	The costs outweigh the benefits. This option has a LOW efficiency.
Effectiveness	Given the amount of existing visitor accommodation at the airport, the amount of residential, staff and aviation related development enabled in the Pukaki airport by Plan Change 30, it is considered that this option is ineffective at ensuring that airport activities are not constrained.
OVERALL APPROPRIATENESS	LOW
OPTION 2	ENABLE MORE VISITOR ACCOMMODATION WITH LIMITS
Benefits	Environmental: None
	Economic:

	<p>Developments such as the proposed will be permitted and other similar developments encouraged. Accommodating more people at the airport will support the economic viability of other activities. Other aircraft operators will be able to offer flight and accommodation packages increasing their economic viability. The increased levels of visitor accommodation in the area would have wider economic benefits. Aircraft operators can more affordably accommodate staff on site and will not have to incur higher costs in accommodating them offsite.</p> <p>Overall, the economic benefits are considered to be MODERATE TO HIGH in the local context.</p>
	<p>Social: The increased accommodation in the district will have a LOW TO MODERATE positive effect through increased social connections</p>
	<p>Cultural: None</p>
Costs	<p>Environmental: None</p>
	<p>Economic: There will potentially be a LOW risk of constraining airport activity. However, that risk can be mitigated by appropriate controls.</p>
	<p>Social: None</p>
	<p>Cultural: None</p>
Efficiency	<p>The benefits of enabling more visitor accommodation within limits exceed the costs. The efficiency of this option is HIGH.</p>
Effectiveness	<p>Enabling more visitor accommodation in the AIRPZ will be effective in achieving the zone's objectives of supporting economic development. The controls proposed will ensure that the AIRPZ objectives that seek to avoid constraining or compromising airport activity will be effectively achieved. (HIGH)</p>
OVERALL APPROPRIATENESS	<p>HIGH</p>
CONCLUSION	<p>Option 2 (enabling more visitor accommodation within limits) is the most efficient and effective option</p>

9.0 Expert Conferencing

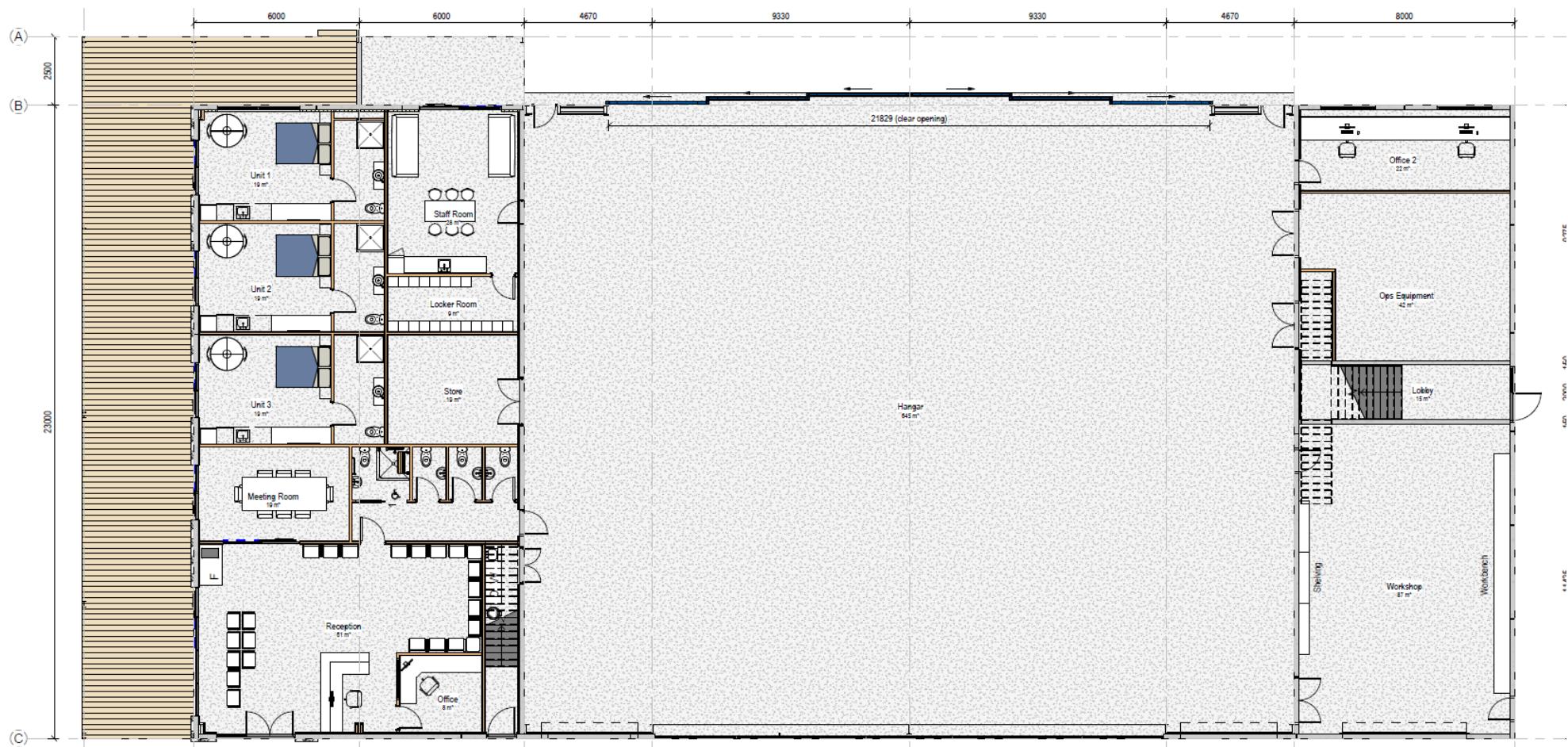
The submitter would be grateful if the Hearings Panel considers asking the Council reporting officer to conference with Perspective Consulting prior to the hearing to see whether an acceptable resolution of this matter can be agreed.

10.0 Conclusion

This submission seeks to amend the AIRPZ provisions to enable more residential, staff accommodation and visitor accommodation. It establishes that the restrictive approach to managing these activities in Plan Change 30 is not effective or efficient, nor supported by expert evidence, complaints or consultation. The proposed amendments will more effectively and efficiently achieve the objectives of the AIRPZ that seek to support economic development while not constraining airport activities.

Appendix 1 – Easement Instrument 7671529.9

Appendix 2 – Floor Plans of the Submitters Proposed Development



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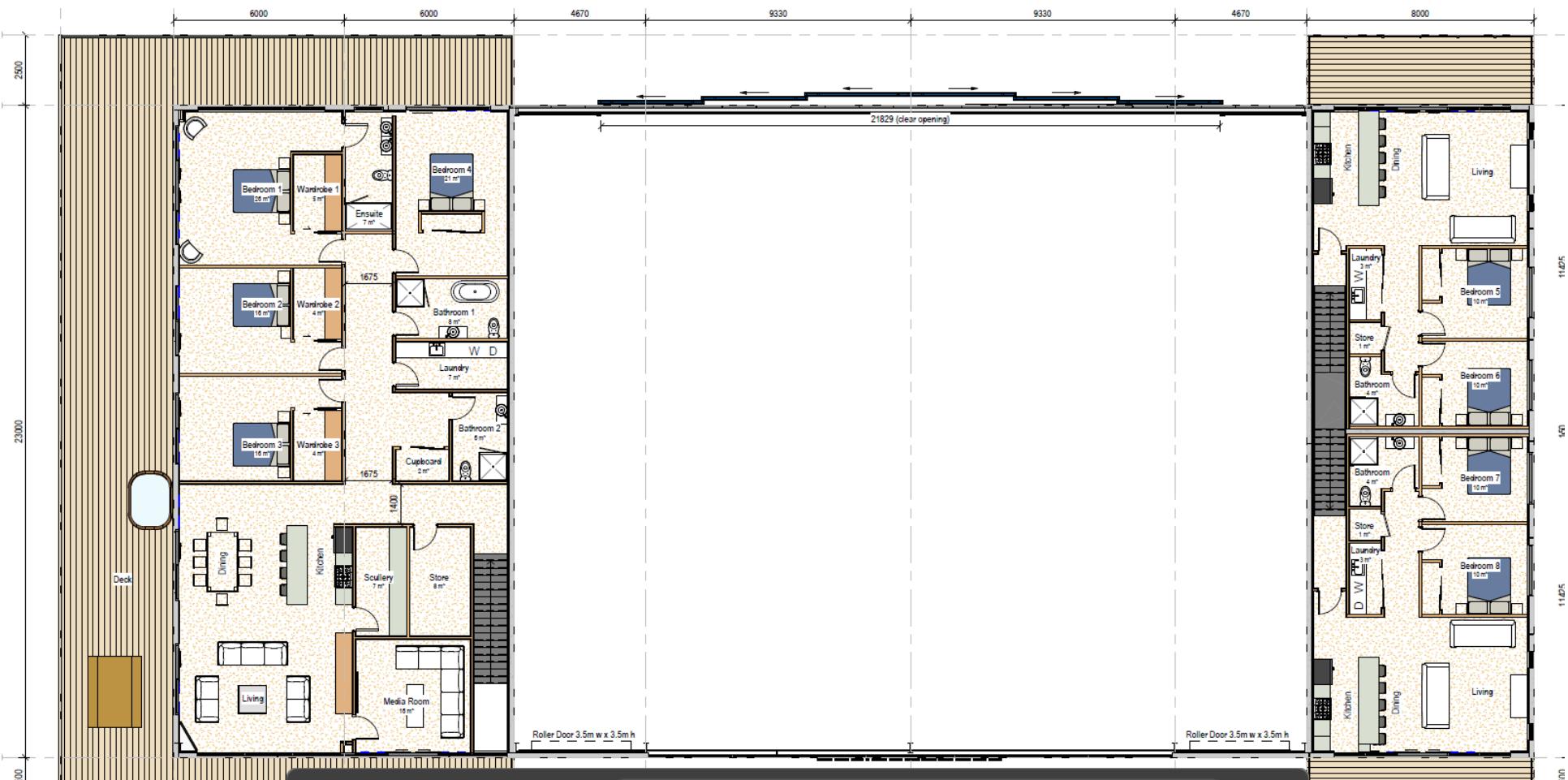


Figure 7 – First floor plan

