

**PLAN CHANGE 30 – SPECIAL PURPOSE ZONES, VARIATION 2 TO PLAN CHANGE 23,
VARIATION 3 TO PLAN CHANGE 26, AND VARIATION 3 TO PLAN CHANGE 27**

FURTHER SUBMISSION

**FORM 6
UNDER CLAUSE 8 OF THE FIRST SCHEDULE OF THE RESOURCE MANAGEMENT
ACT 1991**

Please note all information provided in this submission will be made publicly available

Details of Further Submitter

Full Name: <small>(Required)</small>	Dr Michael Aldo Speck
Contact Person: <small>(If different from above)</small>	
Postal Address: <small>(optional)</small>	P.O. Box 1, Lake Tekapo 7999
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Further Submitter Declaration

I am:

- a person representing a relevant aspect of the public interest. In this case, also specify the grounds for saying that you come within this category below.
- a person who has an interest in the proposal that is greater than the interest the general public has. In this case, also explain the grounds for saying that you come within this category below.

(Tick one box)

I am a working professional in the field of aerospace engineering, with over 16 years' experience in the field, and have partaken in aerospace research and development within the Mackenzie Basin since January 2020. My highest qualification is a Doctorate in Engineering, where my research focused on the development of innovative aerospace flight mechanics, and propulsion.

Further Submission Details

I oppose the submission of:

(enter the name and address of original submitter and the original submitter number)

Director-General of Conservation (the Director-General)

Department of Conservation

Private Bag 4715, Christchurch Mail Centre, Christchurch 8140

PC30 Submission 11

The particular parts of the submission I oppose are:

(clearly indicate which parts of the submission you support or oppose, together with any relevant provisions of the proposal)

I oppose the above submitter's opposition to the *Airport Activity Definition*.

The reasons for my opposition are:

1. Airport definition as proposed in the PC30 is adequate as is.
2. The airport definition as proposed by the above submitter is too restrictive, it suggests excluding aviation research activities.
 - a. Aviation research activities have and continue to provide significant economic benefits to the Mackenzie District and New Zealand. These benefits would be greatly jeopardised if the submitter's proposal is taken on board.
 - b. Aviation research by necessity requires ground-based infrastructure such airports, for air vehicles to take-off or launch from, and land and recovery to. All of the district's airports provide favourable conditions for various aviation research activities. The Glentanner airport infrastructure provides unique aerospace advantage of no controlled airspace from surface through to space. This does not exist elsewhere in New Zealand. Hence, by prohibiting aviation research from Glentanner airport, a unique opportunity is lost for New Zealand.
 - c. Aviation research is extremely varied, it is not just limited rocket powered aircraft, it can and does include electric aircraft, non-powered aircraft, lighter than air aircraft, as well as conventionally powered aircraft.
 - d. Aviation research is already highly (and rightfully) regulated by Civil Aviation Authority, on a case-by-case basis. Hence, PC30 should not further impose additional regulations on the use of airports, particularly when air operations of all types are already governed by CAA rules.
3. The statement "excluding rocket-powered vehicles" is too specific. Rockets by their physical nature can be extremely varied, in size, and characteristics. Hence, it is far too limiting to simply state exclude rocket powered aircraft. If there is a specific problem, e.g.

noise, then appropriate noise limits should be set rather than constraining the type of or nature of the propulsion system used.

4. It seems the submitter has an issue with Dawn Aerospace, which I can only assume is due to the noise of the rocket and potential sonic boom due to crossing the sound barrier. It is my understanding that the sound barrier has only been broken once, which would have occurred at high altitude, and therefore been insignificant to persons and animals on the ground; and the number of rocket powered flights were of extremely low frequency, understood to be less than 20 flights over multiple test campaigns, with flight profiles focusing of rapid climb to altitude and gliding, without power, to landing. Hence, the duration of high noise on and near ground is minimal to ground observers. In my professional opinion low flying agriculture aircraft are far more intrusive from a noise and downwash perspective than a typical rocket powered aircraft, as these aircraft operations by nature are close to ground and involve prolong duration at this low level due the need to make multiple passes to sufficiently cover an intended area.
5. Additionally, the submitter suggests limiting aircraft to rural, tourism, and passenger activities. This would mean flying for recreational and flight training purposes would also be excluded. Both recreational and flight training activities are valid reasonable airport activities that should be supported for the benefit of all New Zealanders. In my professional opinion and my opinion as a recreational aviator the district's airports provide an excellent environment for flight training and recreational flying activities by providing airport services in a mountainous region that is centrally located in the South Island and thus providing good accessibility to flight training institutes and recreational pilots. These groups, particularly flight training groups need to have access to mountainous airports to provide the unique learning opportunities that these airports can provide. Would you like to be passenger in an aircraft flown by a pilot who hasn't been trained in the hazards of mountain flying?
It must be stated that recreational and flight training activities are of low environmental impact as their nature the aircraft used are of low power, and the frequency of operations in and out of the districts airports is low.

I seek that the whole or part (describe part) of the submission be allowed or disallowed: *(give precise details)*

I seek the following as per the table below to be disallowed.

Point (as per Summary of Submissions by Submitters)	Section	Sub-Section	Provision	Position
11.02	Interpretation	Definitions	Airport Activity	Disallowed
11.04	Airport Special Purpose Zone	Objectives	AIRPZ-O1	Disallowed
11.05	Airport Special Purpose Zone	Policies	AIRPZ-P1	Disallowed
11.06	Glentanner Special Purpose Zone	Objectives, Policies and Rules	Objectives GSPZ-O1 and GSPZ-O2, Policy GSPZ-P4, and Rules GSPZ-R12 and GSPZ-R13	Disallowed

I wish to be heard in support of my further submission.

I do not wish to be heard in support of my further submission. (Tick one box)

If others make a similar further submission I **would** be prepared to consider presenting a joint case with them at any hearing.

Signature of further submitter or person authorised to sign on behalf of further submitter (A signature is not required if you make your submission by electronic means.)



Date: 23/02/2025

The closing date for lodging a further submission is **5pm Monday 24 February 2025**. Please note that a copy of your further submission must be served on the original submitter within five working days after it is served on the Mackenzie District Council.

Your submission (or part of your submission) may also be struck out if the authority is satisfied that at least one 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; or
- 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.

Once the closing date for further submissions has passed, Council hearings for the Plan Changes, Variations and Designations will be arranged to consider all submissions. Anyone who has made a submission or further submission and indicated that they wish to be heard will have the right to attend the hearings and present their submission or further submission.

If you have any questions regarding the Plan Changes, Variations and Designations or the further submission process, please do not hesitate to contact the Planning Department at 03 685 9010 or via email districtplan@mackenzie.govt.nz.