



**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: <i>(Required)</i>	Air Safaris & Services (NZ) Ltd
Contact Person: <i>(If different from above)</i>	Tim Rayward
Postal Address: <i>(optional)</i>	P.O. Box 71, Lake Tekapo 7999
Email Address: <i>(Required)</i>	tim@airsafaris.co.nz
Telephone Number: <i>(Required)</i>	021 0767196

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)

Air Safaris & Services (NZ) Ltd is the operator of the Lake Tekapo Airport and responsible for all airport operations and infrastructure. This has included aviation research carried out on the airport including providing support with aircraft, pilots and ground support personnel.

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:

1. Airport Activity definition PC30.13 11.02
2. Airport Special Purpose Zone Policies Provisions PC30.11 AIRPZ-P1 AIRPZ-O1.
3. Glentanner Special Purpose Zone Provisions PC30.06 GSPZ -O1, GSPZ-O2, GSPZ-P4, GSPZ-R12, GSPZ-R13

The reasons for my opposition are:

1. The airport activity definition as proposed in PC30 is adequate as is.
2. The airport definition proposed in PC30 does not include activities beyond the expected scope of airports. The submitter proposes changes that would severely limit legitimate airport activity.
 - a. Airports are where aviation research takes place for the obvious infrastructure support and nature of the activity. Various aviation research has been taking place for the last 30 years or more at airports based in the Mackenzie Basin. Aviation research projects are pre-existing activities, the importance of these was fully discussed during stake holder engagement on AIRPZ's. The aviation research has involved a wide range of aircraft from large balloons to fully autonomous electric powered VTOL aircraft.
 - b. The Mackenzie Basin is chosen for its favourable weather patterns, good airport facilities and support, the only uncontrolled airspace in NZ that extends up to space and large open spaces allowing good line of sight for communications and visual observing.
 - c. Lake Tekapo Airport has been the base for a number of globally significant aviation research projects. i.e. Project Loon - Google X USA - Involved high altitude balloon launches coordinated through Airways NZ and USA based control centre. These balloons and attached equipment were designed to operate above commercial airline traffic and encircle the globe providing internet to remote areas

of the world. A large team were based at the airport over quite a period of time conducting a high number of balloon launches. Wisk New Zealand LLC - involved autonomous electric powered VTOL aircraft, research, development and test flight program. Specially built facilities including fully insulated hangar/workshop with dedicated high capacity power supply for large scale battery charging. Extensive flight testing took place for several years involving support from local companies and staff. Other more recent aviation research has included an Airspace Integration Trial Program run by Insitu Pacific using UAVs.

3. The clause **d. Aviation research and testing laboratories** needs to remain as they are integral with aviation development, additionally the associated research projects provide massive opportunities for the region in terms of local employment, innovation and exposure on the world stage.
4. The submitters proposal to amend the use of airports (or try to define the "type" of permitted aviation activity) to **rural, tourism and passenger activities** is unreasonable and not practical. It would exclude a large portion of current reasonable & valid airport activity ie Recreational, flight training, flight testing, survey, photography, gliding etc.
5. **Excluding rocket-powered vehicles** is also unreasonable, there is a large range of rocket types, operational characteristics and size. Any impacts from this sort of activity would be carefully assessed by airport operators and NZCAA and any required mitigation for specific issues would be put in place. The reference to supersonic flight by the submitter is "emotive", it is happening at an altitude where it would be barely perceptible on the ground and regulated by NZCAA. Dawn Aerospace example : The limited nature of the testing, rapid climb away (extremely high altitude flight) and glide return to landing means the environmental impact is significantly less than other "normal" aviation. ie low level helicopter agricultural operations would be considered more intrusive on the natural environment.
6. The submitter seeks to add the wording and natural values within the Policies Provisions, we would question the relevance and oppose the addition. The Policy refers to built development not aviation activity. Furthermore the term "natural values" is extremely vague and could be interpreted in any number of ways. The ecological value of surrounding land is protected by the rule provisions related to that zone. Landscape character and visual amenity are reasonable in a built development sense but not trying to include the term natural values.

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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

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- ☐ 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 not** 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: 24.02.2025

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.