

Submitter #84 evidence to draft Te Pūtahi Ladies Mile master plan

FlightPlan2050
John Hilhorst
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To future-proof the existing Ladies Mile Corridor for possible future adaption to double as a Lifeline Utility civil emergency runway should that at any future time become desirable, we ask:

Relief sought:

1. You retain the existing Restricted Building Area zoning extending 80 m to the north and south of Ladies Mile (SH6) as shown as the blue hatched area in Figure 1 below, and*

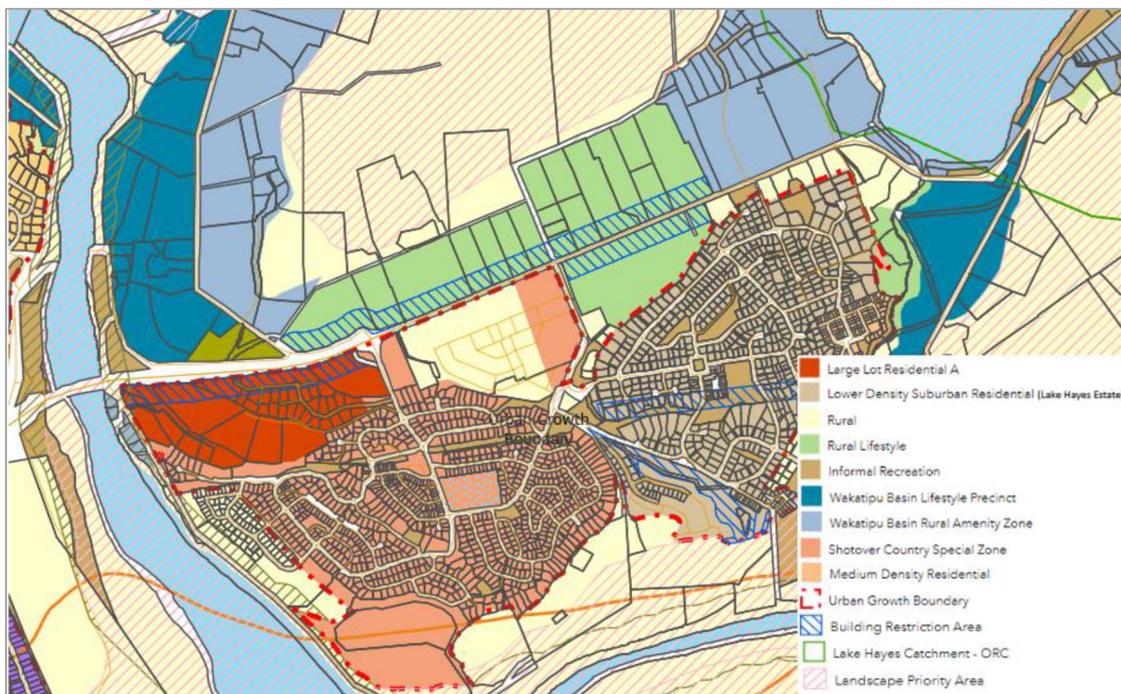


Figure 1: Existing zonings

*2. Provide for a similar Restricted Building Area zoning to the section of road to the south of SH6 between Stalker Road and Howards Drive.**

*3. That the Ladies Mile landscape plan be restricted to new plantings** less than 2 m height within 30 m of the road centreline, and to 4 m for the remainder up to 40 m from the road centreline.*

Clarifications:

* Our original submission had, by error, not adequately identified the Restricted Building Area zones that we sought relief for, so we clarify them here.

** Our submission does not seek the removal of any existing trees, as inferred in the Section 42A Hearing Report, so we make that explicit here.

Comment

If adopted in its current form, the draft Te Pūtahi Ladies Mile Zone (TPLMZ) would sabotage any future potential adaption of Ladies Mile to enable it to double as a runway during civil emergencies.

Because:

1. The draft plan reduces the existing Restricted Building Area zoning on either side of SH6 from 80 m down to 25 m. The resulting 75 m total width (including the 20 m NZTA state highway) is insufficient for planned use by Air Force Hercules aircraft.
2. The draft plan promotes the landscaping of Ladies Mile to feature an avenue of trees. If allowed to grow, such trees would present a significant hurdle in any future discussion about adapting the road corridor for emergency runway use, as people don't like felling trees.

These effects would permanently prevent the future adaption of Ladies Mile to serve as an emergency runway.

That is not a trifling matter, as any future discussion of to what extent and when we might decide that Frankton Flats would best be used for urban intensification could only be had on the condition that a viable alternative emergency runway existed within the Whakatipu Basin.

An alternative emergency runway would be essential because we must retain capacity within the Wakatipu Basin for high-volume airlift of people and supplies in the case of emergency. The Ladies Mile Corridor could be adapted so as to easily convert from highway to runway to serve this function at such times.

I realise that making any determinations about the zoning or future use of other areas, such as Frankton Flats, is outside the purview of this hearing. Nevertheless, I consider it important that the Panel consider the wider strategic implications of the decisions made at Ladies Mile.

In this case, eliminating any future possibility for Ladies Mile to be adapted sometime in the future to double as an emergency runway effectively prevents any future consideration of Queenstown Airport's relocation and the urban intensification of Frankton Flats.

Your decision regarding the changed Restricted Building Area zones and the proposed landscaping in the TPLMZ will have profound ramifications on the district's future strategic options, whether they are retained or lost.

In this report, we first respond to the Section 42A Hearing Report, which, in our view, substantially underestimated the importance and benefits of the relief sought, and incorrectly assumed costs that don't exist.

We then briefly consider the credibility of CIAL's Central Otago Airport and the potential urbanisation of Frankton Flats. We include these to provide context – they show that Queenstown Airport's continued need or desirability to remain in Frankton is not certain and there are compelling reasons to protect alternative strategic options for the district.

Section 42A Hearing Report

The Section 42A Hearing Report prepared by Jeff Brown recommended against our submission, considering that the costs outweighed the benefits.

We spoke with Mr. Brown at the Ladies Mile public consultation session at Shotover Country Primary School on 12 November 2020, where we first raised the need to protect this road's future potential use as a runway during civil emergencies.

In that discussion, when we suggested that sometime in the future, we might need to relocate Queenstown Airport, Mr Brown stated:

"I fly into Queenstown every couple of weeks. I don't want to drive an hour to Tarras each time I fly."

We were dismayed that the first and only comment Mr Brown made during our discussion was through that lens of self-interest. Therefore, we were not surprised by the low weight he gave our concerns in his Section 42A Hearing Report.

For the record, this perceived hurdle of distance could be easily mitigated by the time such a need arrives. New technology in electric vertical takeoff and landing (eVTOL) craft could easily transport time-precious frequent flyers to the proposed Central Otago Airport within 15 minutes from several vertiports located throughout the Whakatipu Basin.

We take this opportunity to challenge Mr Brown's advice to you.

In 11.268 (a), Mr Brown's assessment grossly undervalues the emergency risk, fails to appreciate resilience planning, and massively underestimates the scale of the crisis we will face in the event of an AF8 earthquake. We note:

1. Understanding the scale and certainty of the district's seismic risk and the disruption it will cause is essential when assessing our submission and the importance of protecting the infrastructure potential we may wish to develop in the future.
2. A magnitude eight seismic event is a certainty – the only 'risk' element is the unknown timing. We are beyond the periodic mean of the Alpine Fault's regular cycle, with scientists giving a 75% probability of the event occurring within the next 50 years.
3. Duplication and redundancy are fundamental elements of resilience preparation. Having a Plan B is especially essential for critical infrastructure, a concept entirely missed by Mr Brown's suggestion that if "Queenstown Airport's runway is out of action, chances are SH6 at Ladies Mile will be similarly afflicted."

The *AF8 Saver Framework* report estimates Queenstown Airport will potentially be damaged during such a seismic event, making a Plan B highly desirable.

4. Mr Brown's suggestion that if runways and bridges were out, "then helicopters would seem to me to be the logical form of transport," exposes a significant underappreciation of the scale of emergency response needed for the anticipated seismic event.

Today, we have a resident population of 34,200 in the Whakatipu but can average over 44,000 visitors during the busy months, reaching over 80,000 visitors in the Christmas / New Year period. These numbers are projected to nearly double by 2050, with continuing growth after that likely to see a further doubling in subsequent decades.

The district's emergency response target is the total evacuation of visitors to Invercargill Airport within five days. By 2050, that could require the rapid evacuation of 160,000 visitors – ten times Auckland Airport's average daily departing passenger movements. That's an enormous challenge requiring substantial airlift capacity well beyond the scope of a few helicopters, which, in any event, are better used in such cases for reconnaissance and attending to medical/injury priorities.

5. High-volume airlift capacity will remain essential for months following the initial evacuations. Civil Defence planning anticipates the Crown Range, Kawarau Gorge, and Kingston highways to sustain severe damage and be closed for months. So, our district's resilience planning requires the sustained capacity to airlift tens of tonnes of freight daily for an indefinite period, including food and fuel for the remaining residents and equipment for shelter and recovery.
6. In the absence of Queenstown Airport (whether it is damaged by the earthquake or at some future time relocated), the Ladies Mile stretch of SH6 could service the required airlift capacity using some of the New Zealand and Australian Air Force transport aircraft, with over forty-five C-17, C-130 and C-27 Hercules aircraft in their combined fleets.

In 11.268 (b), Mr Brown fails entirely to appreciate the urban potential of Frankton Flats when he suggests that if "Queenstown Airport land is ever converted to urban activities, it would be sensible to retain a sufficient width of the existing runway ... so that the runway can still be used by emergency aircraft."

1. We recognise that the Panel has no jurisdiction regarding the urban intensification of Frankton Flats. However, understanding this context is essential to assess how credible the need for an alternative emergency runway is sometime in the future and, therefore, the importance of protecting that capacity at Ladies Mile.
2. Panel members will be well aware of the district's population projections that anticipate population nearly doubling by 2050. The Infrastructure Commission's recent submission on QLDC's Urban Intensification Variation urges planning for "an urban Queenstown population size of two to three times its existing population."
3. The urban intensification of Frankton Flats offers an unprecedented opportunity to create a fully integrated CBD-campus that could eventually accommodate 30,000 residents in a beautifully liveable, working, smart city located in the central hub of the Whakatipu's five principal Suburban zones. It offers a credible alternative to the equivalent of twelve TPLMZs that would otherwise be needed to accommodate the same number of people, the Whakatipu's projected growth by 2050.
4. Such potential would be severely undermined if a working runway with building setbacks continued to cut through the very heart of what could be the district's CBD. The airport's associated air noise boundaries would continue to totally compromise urban construction and land use, with activities sensitive to aircraft noise excluded, as they are now. These include the business, retail, educational, medical, and residential activities vital to a thriving city.
5. Realising the opportunity at Frankton requires the removal of Queenstown Airport, leaving only a base for vertical takeoff and landing helicopters and electric passenger

drones.

6. As we outline later in this report, the prospect of relocating Queenstown Airport is significantly increasing.

In 11.269, Mr Brown is wrong to infer that the importance of our submission diminishes because "neither Queenstown Airport or Airways Corporation have filed submissions seeking similar relief".

We note:

1. There is no surprise that Queenstown Airport Corporation hasn't submitted to protect this option. QAC has adopted a belligerent approach to the proposed Central Otago Airport, writing in its statement of intent that it will "protect the value and operational priority of Queenstown Airport in the context of the proposed international airport at Tarras." It is staunchly protecting its patch as might a private company that seeks to protect its interests rather than concerning itself with understanding the wider issues facing the district outside its commercial mandate. In this context, it is highly unlikely that QAC would advocate that an alternative exists for its Lifeline Utility status.
2. Therefore, in its current corporate mindset of protecting self-interest, QAC would more likely object to our submission than support it. Indeed, the absence of prudent strategic leadership by QAC on this matter should put greater weight, not less, on the concerns our independent submission raises.
3. Similarly, the absence of a submission from Airways Corporation has no bearing on our submission's merits. Protecting the potential of a roadway to serve as an emergency runway is simply beyond Airways Corporation's purview, core business, and the services it provides.

In 11.270, Mr Brown determines that "I do not consider the cost of *adapting* the SH6 corridor at Ladies Mile to be used as an emergency runway, including the loss of the existing amenity treescape along much of the northern side, outweighed by the benefits seen." He has misunderstood our submission and, therefore, drawn a false conclusion.

1. Our submission did not seek to **adapt** Ladies Mile so it could easily convert to an emergency runway. We sought only to protect that potential so that it might be adapted sometime in the future.
2. The 80 m Restricted Building Area zone is an existing community asset and there is no financial cost in retaining it. This existing community asset has excellent value in preserving the Ladies Mile roadway for future potential use as a civil emergency runway.
3. Retaining this community asset does not diminish any person's existing property rights.
4. Retaining the existing 80 m Restricted Building Area zone could be achieved without any significant reduction in the planned housing capacity of the proposed TPLMP.

The draft Ladies Mile master plan used during the 2021 consultation has one school adjacent to the roadway, and the other could be similarly placed. With their fields to the front and buildings away from the road to the north, they could easily keep the school buildings outside the RBA zone.

The draft TPLMZ identifies the area east of Howards Drive and south of SH6 as an 'Open Space Precinct'. There will, therefore, be nothing lost by formalising a Restricted Building Area zone here.

The draft TPLMZ already includes a sufficient Restricted Building Area on the 'Lower Density Suburban Residential Zone' between Howards Drive and Stalker Road.

So, as well as no financial cost for the remedy we seek, minor adaptations to the master plan could enable it with little opportunity cost regarding the overall density and accommodation capacity sought in the TPLMZ.

5. We have not asked for the removal of any trees, as suggested by Mr Brown. Instead, we requested that you stop the draft landscape plan that proposes an avenue of trees along SH6 at Ladies Mile.

Once established, public sentiment would make it difficult to remove these trees, which could prevent any later adaptation of the road to serve as an emergency runway.

There is no need for such an avenue of trees when there are many excellent alternative landscape options, such as those at Jacks Point. There is no additional cost for alternative landscaping, and lower profile planting likely provides better sightlines to the district's outstanding landscapes for users of the road.

Indeed, an East-West avenue of trees in our climate is undesirable as it would permanently shade the roadway, causing frost/ice hazards on this arterial route during winter.

The landscaping of tree avenues could be better applied to the north/south corridors to visually emphasise the linkages between the TPLMP development to the north with Lake Hayes and Shotover Country Estates to the south of Ladies Mile.

Given that excellent alternative landscaping options exist at no extra cost that could protect the Ladies Mile corridor's runway potential, it seems extreme to insist on an east-west avenue of trees on the state highway.

And when knowing the potential of this corridor and its importance in any future discussion of Frankton Intensification or airport relocation, insisting on an avenue of trees could be seen as deliberate sabotage of those ideas.

6. CIAL's proposed Central Otago Airport forces the discussion of Queenstown Airport's ongoing viability, even without apparent support from the local Council. If that airport proceeds, the opportunity cost of Queenstown Airport blocking central urban density increases each year as the district's population grows. We consider the proposal's credibility later in this report to provide context for this aspect.
7. So, there are no financial or engineering costs in agreeing to our submission. There are no additional landscaping costs. There's no loss of private or community value and, with slight modification to the draft master plan, the relief could be provided with little or no opportunity cost in terms of the TPLMZ total accommodation potential.

We simply request you retain an existing designation within the district plan and adapt

a proposed landscape plan.

8. While there is almost no cost or downside in agreeing to our submission, there is an enormous upside.
9. The freedom now, or sometime in the future, to consider relocating Queenstown Airport depends entirely on an alternative runway being available in case of civil emergency.

The existing 80 m Restricted Building Area zones alongside Ladies Mile give us that freedom.

Such potential has enormous value, and this value is sustained over decades, even centuries. And the importance of this potential intensifies with each year's population growth.

We don't know the future, and much can change – especially in this region of high growth with the pressing issues of housing affordability, transport, dependence on tourism, climate change, and more. Our resilience and success in negotiating these issues depend heavily on our adaptability. And this depends on keeping our options open.

In contrast, reducing the Restricted Building Area zones will permanently remove this opportunity because the urban form encroaching on the potential runway area, once enabled, will remain for generations. Much longer than the entire life cycle of the individual buildings.

Prudent planning with a 'no regrets' approach would place great value on retaining this option, enabling the high-density urbanisation of Frankton Flats.

10. So, in direct contrast to Mr Brown's determination, there is immense value in retaining the emergency runway potential by keeping the existing 80 m RBA zones and preventing new tree planting. At the same time, there are negligible costs associated with this decision.

So, there are virtually no costs in providing the relief we seek, which is primarily asking that you retain an existing community asset and adapt the plants used in a landscaping plan.

And the benefits of providing the relief are substantial, in that the district would retain important options in its strategic planning that would otherwise be lost. With its immense uncertainty and challenges of rapid population growth, decreasing housing affordability, economic dependence on tourism, and climate change, the district's capacity to adapt is fundamental to its ongoing resilience.

For these reasons, we ask that you put Mr Brown's advice to the side and consider afresh the concerns we raise and the relief we seek in our submission.

The district is in a period of considerable uncertainty, with Christchurch International Airport Ltd (CIAL) actively investigating a new Central Otago Airport that could be operational within a decade. If realised, it would end the district's dependence on Queenstown Airport as the crucial role of an airport in supporting the region's economic and social well-being could be serviced from a single

location near Tarras, with greater freight capacity for regional growers and fewer weather-induced flight delays.

Such eventuality would raise questions, now or sometime in the future, on whether an airport is the best use of Frankton Flats. But without a viable alternative emergency runway capacity, there is no option but to retain it.

The implications of your decision regarding the Ladies Mile corridor will impact those future discussions. So, how credible is the proposed Central Otago Airport and how beneficial might the urbanisation of Frankton Flats be?

How credible is the proposed Central Otago Airport?

The credibility of Christchurch International Airport Ltd's (CIAL) proposed Central Otago Airport is relevant when considering our submission, as that airport's viability bears significantly on considering any future closure of Queenstown Airport and the consequential need for an alternative emergency runway.

The Ladies Mile corridor along SH6 is uniquely placed to be such a runway and to take on the Lifeline Utility designation currently with Queenstown Airport, making this consideration relevant to your decisions concerning the TPLMZ.

For context, we ask that you remember that QAC itself sought to establish an 'overflow' airport at Wānaka to accommodate 3.2 million passenger movements by 2050 because of the capacity constraints it anticipated at Queenstown Airport. These plans only stalled when a judicial review found inadequate community consultation and quashed QAC's hundred-year lease of Wānaka's Airport from QLDC.

CIAL is a substantial company with the capacity, expertise, and financial resources to deliver on its Central Otago ambition. It has invested over \$50 million, purchased a landholding more than five times that held by QAC in Frankton and is committed to investigating and progressing this project.

CIAL could deliver this new international airport that could meet all our region's needs for transport, tourism, and freight from a single location within a 6 to 8-year timeframe.

While there is loud opposition, this is primarily focused on climate change concerns regarding an *additional* airport facilitating more significant growth in flight emissions. But such concern could be baseless if the airport were instead a replacement for Queenstown's rather than an extra new airport. Indeed, our published analysis (*Structural response to climate change – Queenstown Lakes District*, May 2023) makes a strong case that the closure and relocation of Queenstown Airport to enable the development of a high-density CBD-campus at Frankton could offer the best climate mitigation strategy for the Central Lakes region.

We note that **Carrie Hurihanganui**, when Air New Zealand's chief operating officer, said, "Airport infrastructure in Queenstown ... will eventually exceed its capacity limits ... even combined with investment into Wānaka airport."

In **Air New Zealand's submission** to QAC's air noise boundary expansion, she wrote, "We believe consideration should be given to the establishment of an airport that can cater for the future growth of all domestic and international travel to Otago, as well as the appropriate transport solutions to disperse those visitors to all central Otago communities."

Significantly, Ms Hurihanganui is now **CEO of Auckland International Airport**, which owns 25% of QAC.

We also note that **Christopher Luxon**, when CEO of Air New Zealand, argued at the company's AGM that it's time "to have a bigger, bolder, braver conversation about creating a new Central Otago regional airport that could support Queenstown and Wānaka but from a different location than where those airports exist today."

Mr. Luxton is our new **Prime Minister**, and his goal to get New Zealand "back on track" suggests his continuing support for the growth-enabling infrastructure CIAL's airport proposal represents.

BARNZ (the voice of the New Zealand airline industry) and individual airlines have openly advocated for a new Central Otago airport in submissions to QAC and QLDC, at shareholder meetings, and in media statements. They value the safer approaches, shorter flight times, more efficient descent and climb profiles, fewer constraints, and fewer weather disruptions that CIAL's proposed location offers.

While previous Mayor Boulton adamantly opposed CIAL's proposal, the local mayor, Council, and circumstances have changed. Notably, the momentum and agency of CIAL's proposal sit outside the Queenstown Lakes District.

So, the Central Otago Airport proposal was not an aberration and could soon be a reality.

Such an eventuality would substantially impact Queenstown Airport's continued financial viability. Queenstown Airport would likely become second fiddle to the Central Otago Airport, and the opportunity cost of its Frankton landholding would escalate significantly under population pressure.

Independent of what Queenstown Lakes District Council or QAC might want and beyond their control, the prospect of a new Central Otago airport is real – potentially within a decade – and this will drive calls to review the zoning of Frankton Flats.

The urban development of Frankton Flats

While the Panel has no role in making any determinations about the zoning or future use of Frankton Flats, your decision on whether or not to protect the Ladies Mile corridor for future potential emergency runway use will substantially shape any future strategic consideration of Frankton Flats.

Therefore, we provide the following.

Already in the view of many, the Queenstown Airport is simply in the wrong place for the district's current and future needs. The availability of an alternative such as the proposed Central Otago Airport presents a unique opportunity for more central urban development to accommodate the district's growing population instead of continued suburban developments throughout the Whakatipu Basin.

Central, flat and sunny, Frankton Flats already contains much of the required educational, medical, retail, community, recreational, light industry and infrastructural facilities. The transport infrastructure and ring road protecting its heart are already in place.

The image in Figure 2 on the following page shows Frankton Flats as the central hub of Whakatipu's five existing suburban zones, including the TPLMZ in the eastern corridor. It highlights the strategic advantage of Centralising the district's urban population for transport and utility network efficiencies.

Frankton Flats is central to the Whakatipu’s urban development

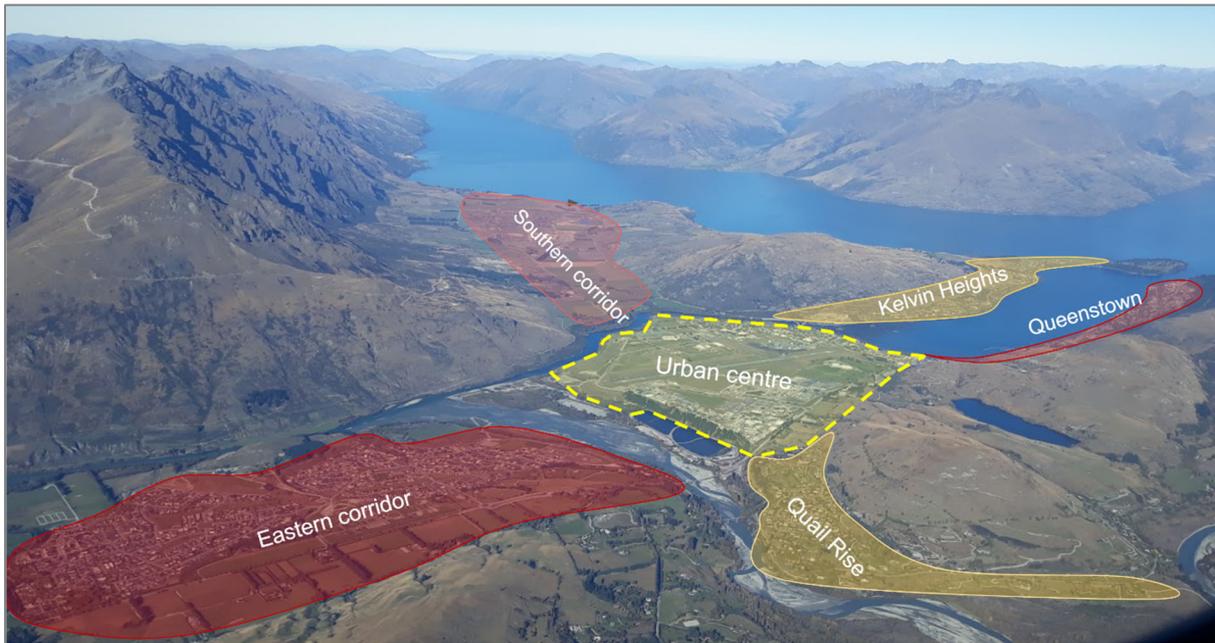


Figure 2: Aerial view of the Whakatipu Basin showing Frankton Flats is the central hub of the Whakatipu's five existing suburban zones.

The obvious benefits of this central urban development were not lost on those developing the district’s Spatial Plan.

That plan identifies Frankton Flats as the district’s principal metropolitan centre. It is worth noting that their draft plan presented for feedback depicted two smaller centres on Frankton Flats, Five Mile to the north and Remarkables Park to the south, split by Queenstown Airport. As a result of public feedback, this changed in the final plan to show a single large metropolitan centre designation over the whole of Frankton Flats.

But the plan’s narrative and map of the Whakatipu sidestepped the airport debate. The map in Figure 3 on the next page shows the Spatial Plan indicating only a tiny airport icon in the middle of the Flats, which is otherwise highlighted as the district’s principal metropolitan centre.

In Figure 4, we overlay the airport’s runway, landholding and air noise boundaries instead of the Spatial Plan’s tiny icon. This image highlights the incompatibility of Queenstown Airport with the plan’s vision for Frankton Flats.

The 153-ha Queenstown Airport dominates this area, splitting the Flats in half.

Well beyond the airport’s property perimeter, the airport’s air noise boundaries and special designations overlay private property in surrounding zones. These restrict land use options, inflict soundproofing and mechanical ventilation costs on property owners, and restrict building heights even when allowed by the underlying zoning of the District Plan. They severely limit business, residential and urban development over most of the Flats and nearby suburbs.

Retaining the airport in Frankton is incompatible with the Spatial Plan and the development of an attractive high-density, liveable town. It destroys the potential establishment of a thriving knowledge economy in the Queenstown Lakes District.

The Spatial Plan identifies the whole of Frankton Flats as the district’s principal metropolitan centre

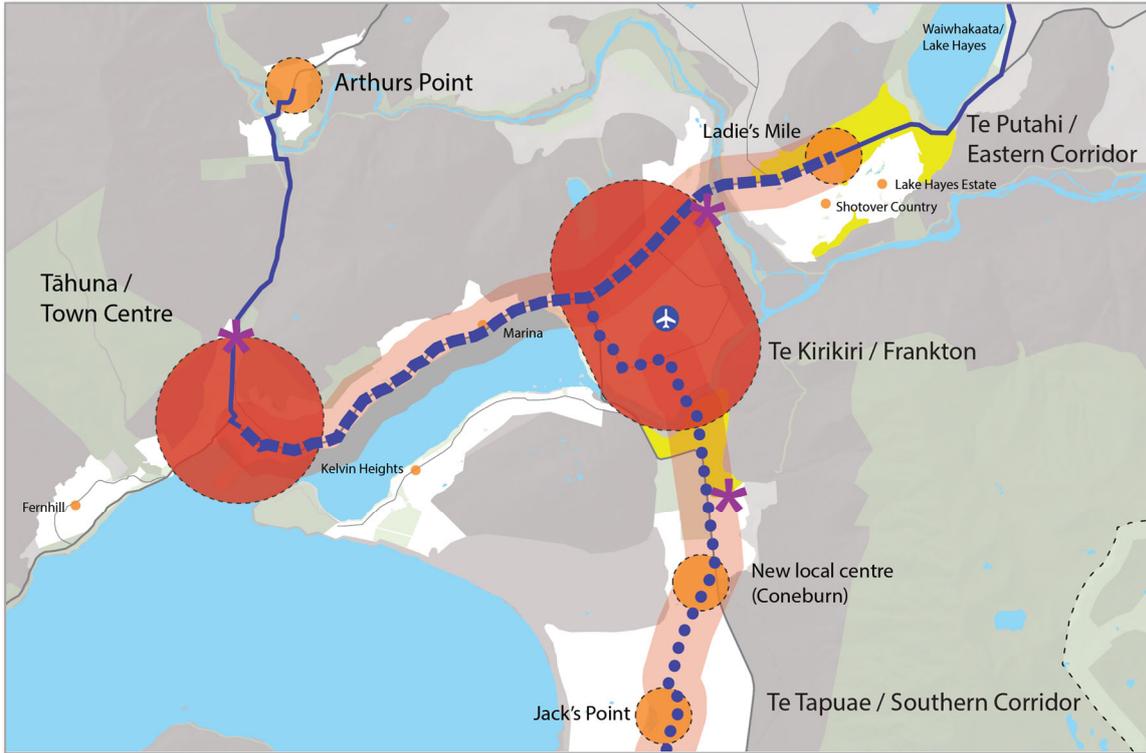


Figure 3: Queenstown Lakes Spatial Plan identifies Frankton Flats as the district's principal metropolitan centre. Its aspiration sidesteps the airport conflict by diminishing its presence to a tiny airport icon.

Queenstown Airport is incompatible with the district’s Spatial Plan

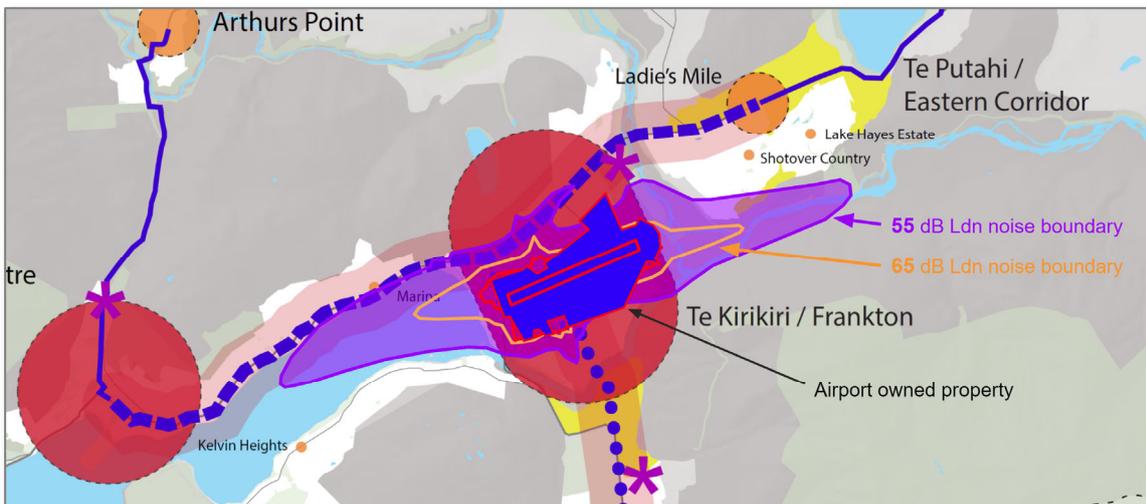


Figure 4: When we overlay the airport and its airnoise boundaries it highlights that Queenstown Airport prevents any potential for Te Kirikiri / Frankton to ever be a liveable town or a thriving centre.

These issues are evident when reviewing the Council-commissioned Frankton Masterplan 2019.

In Figure 5 on the following page, we overlay the existing air noise boundaries (in purple), highlighting how their associated development restrictions entirely compromise the master plan.

The air noise boundary restrictions squeeze the high-density commercial and residential zones out to the northern and southern edges. Four-storey high, small-box retail is forced away from the airport boundary and located along State Highway 6, further choking the district’s primary arterial route.

A failed Frankton Masterplan

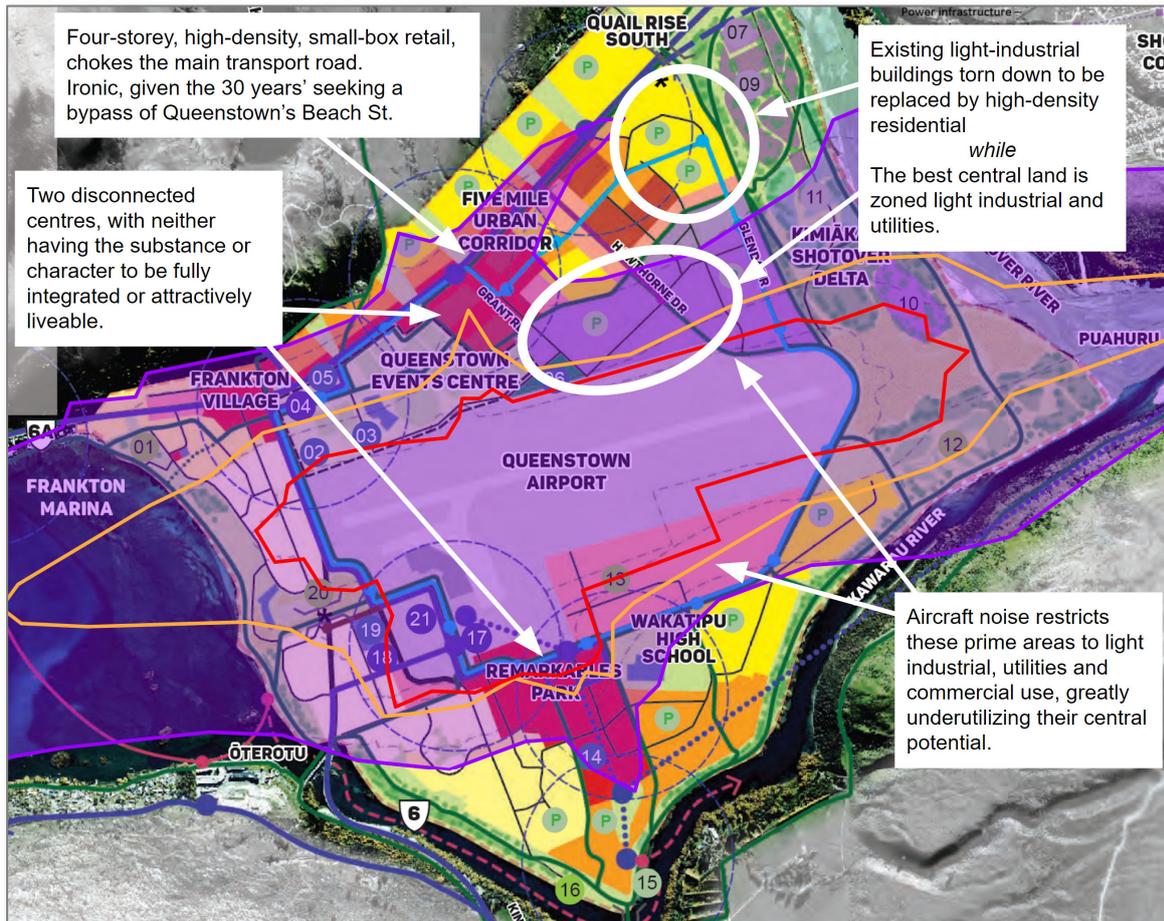


Figure 5: The purple shading shows the area designated within existing air noise boundaries. Source: adapted by FlightPlan2050 from the Frankton Masterplan with the existing air noise boundaries overlaid.

The Frankton Masterplan would also tear down the Glenda Drive industrial buildings, replacing them with residential apartments. That's because the airport's air noise boundary restrictions result in too little land on the Flats being available for residential use, forcing the master plan authors to suggest we bulldoze the Glenda Drive light industrial estates to make room.

The airport's negative effects on on the possible urban intensification of Frankton Flats is further demonstrated in Council's current consultation on its Urban Intensification Variation plan. As shown in Figure 6 on the next page within the red circle. That map shows the demarcation from one property to the other follows precisely the current air noise boundaries.

Airport’s air noise boundaries limit urban development.



Figure 6: The area coloured light orange within the red circle show the properties recommended for intensification. The northern edge of this section precisely follows the airport's outer airnoise boundary.

While it’s not the Panel’s role to make determinations about the zoning or future use of Frankton Flats, recognising its immense potential as the district’s principal metropolitan centre and understanding how Queenstown Airport profoundly compromises this potential gives context to the importance of protecting alternative emergency runway options.

The absence of such an alternative would prevent any future option of removing Queenstown Airport. The Ladies Mile corridor currently provides that alternative emergency runway potential.

As it stands, the draft TPLMZ plan would destroy forever any potential for the Ladies Mile corridor to be engineered so that it could convert to a runway during times of civil emergency.

Protecting this emergency runway option is in the hands of your Panel and the decisions you make in this TPLMZ hearing. It is a small matter with almost no cost for you to protect the existing 80 m Restricted Building Area and to alter the proposed landscape plan along SH6.

Providing the relief we seek is immensely valuable, in that it ensures fundamental strategic options remain available for the district’s future development.

Thank you for your time and consideration.

John Hilhorst
FlightPlan2050