Name	Contact Person (if appicable)	Address for Service	Submission point number	Specific provisions of proposal	Support/ Oppose/ Amend	Summary of Submission	Summary of Relief
Marlborough Aero Club Inc	Kate O'Sullivan	president@marlboroughaeroclub.co.nz	1.1	3.4.1	Support	Marlborough Aero Club supports Plan Change 1 and the introduction of an airport protection standard into Rule 3.4.1 relating to the erection and use of frost fans. The Club considers the proposed change necessary to ensure future frost fan developments near Marlborough's airports are properly assessed against the applicable Obstacle Limitation Surfaces (OLS) before consent is granted. This demonstrates the importance of ensuring aviation safety effects are properly considered as part of future consenting decisions.	Marlborough Aero Club seeks that Plan Change 1 be approved, that the proposed standard require applicants to demonstrate that a frost fan in its fully erected and operational position will not penetrate any applicable OLS and that appropriate survey or technical information be used where necessary to demonstrate compliance. Marlborough Aero Club seeks to be identified and notified as an affected party for any future resource consent application where a proposed frost fan, structure or activity may penetrate, affect or otherwise interact with the Omaka Aerodrome OLS, or have potential implications for safe aerodrome operations.
			1.2	OLS northern boundary mapping	Support in part	Marlborough Aero Club wishes to formally record a mapping issue where the aerodrome boundary recorded in Council's planning maps does not represent the operational aerodrome boundary and excludes areas associated with active runway operations. As a result, the mapped boundary should not be relied upon as an accurate basis for determining the extent or application of Omaka's airport protection surfaces. The Club does not seek for this mapping issue to delay or prevent Plan Change 1 from proceeding.	The remedy sought is for Council to review and correct the mapped Omaka Aerodrome boundary so that it accurately reflects the operational aerodrome and for future OLS mapping and assessments to be based on that corrected information. The Club further seeks formal acknowledgement of the Omaka Aerodrome mapping issue, reassurance that the underlying mapping will be corrected before it is relied upon in future planning or consenting decisions, confirmation that Marlborough Aero Club will be notified of future applications with the potential to affect Omaka Aerodrome or its OLS and confirmation that Council will appropriately consider any confirmed aviation safety hazard associated with existing consented structures.
			1.3	CAA Part 77 process	Support in part	The Club further asks Council to formally acknowledge that it is now aware of information indicating that existing consented frost fans may penetrate protected OLS and may present a serious aviation safety concern. The Club understands that the current CAA Part 77 process has not yet reached a final hazard determination and does not seek to pre-empt that process.	Should the CAA determination, survey information or other technical evidence confirm that an existing consented structure constitutes an aviation hazard, the Club asks Council to promptly consider all statutory mechanisms available to it in relation to that consent or activity, including review of consent conditions and where the relevant statutory thresholds are met, modification, restriction or cancellation of the consent or other appropriate enforcement action.
Rangitane o Wairau	Megan Plier	taiao@rangitane.org.nz	2.1	3.4.1	Support	Rangitāne supports the proposed amendment as it establishes a clearer framework for ensuring that future frost fans are appropriately located to avoid encroachment into an Obstacle Limitation Surface (OLS), while allowing them to continue to support productive land use without compromising aviation safety or creating avoidable risks for airport operations and the wider community.	N/A
New Zealand Defence Force	Rebecca Davies	New Zealand Defence Force C/- Tonkin + Taylor PO Box 9544 Hamilton 3204 Attention: Alia Cederman	3.1	Standard 3.4.1.7	Support in part	NZDF supports the intention of PC1 to improve civil aviation safety and the proposed approach of adding a standard to the controlled activity Rule 3.4.1 so that non-compliance with the standard results in a discretionary activity. NZDF notes that the wording of the proposed controlled activity standard 3.4.1.7 mirrors that of permitted activity standard 3.2.2.1. NZDF supports the proposed standard's direct references to Appendices 14 and 15. However, while the expression "flight path, take off, climb/approach fan or transitional slide slope" aligns with permitted activity rule 3.2.2.1, it does not align with the terminology used in those appendices. Adding reference to an "obstacle limitation surface" would improve consistency and make the standard clearer for plan users. Additionally, using "or" rather than "and" more clearly conveys the intention the standard apply to OLS in either Appendix 14 or Appendix 15.	NZDF requests the following wording amendments to standard 3.4.1.7, or wording to similar effect: A frost fan must not penetrate **an obstacle limitation surface (e.g**. a flight path, take off, climb/approach fan or transitional slide slope) described in Section A of Appendix 14 ~~and~~ **or** identified in Appendix 15. Ideally, the wording in Rule 3.2.2.1 would also be amended to be consistent, although that may be outside the scope of PC1. NZDF seeks relief that addresses the points above, including any such further alternative or consequential relief as may be necessary to fully give effect to this submission.
			3.2	Application to temporary frost fans	Support in part	NZDF seeks confirmation that proposed standard 3.4.1.7 applies to all frost fans, including temporary and transportable frost fans. A temporary or transportable frost fan that penetrates an OLS presents the same aviation safety risk as a fixed frost fan for as long as the penetration remains. The Section 32 Report describes trailored, transportable frost fans as exempt from PC1 and RMA provisions on the basis they are not 'structures' as defined under the RMA. While trailored or transportable frost fans are not 'fixed to land' and are therefore not defined as 'structures' that does not mean they cannot be regulated under the RMA. The RMA does not restrict regulation to structures and buildings and there are many examples of activities that are not structures that are regulated in district plans, including in the pMEP.	Proposed standard 3.4.1.7 uses the term "frost fan" rather than "structure" and the pMEP definition of "frost fan" includes both "permanent and mobile" devices. NZDF therefore considers that the proposed standard applies to all frost fans, mobile and fixed. NZDF seeks retention of this approach and express confirmation that the standard applies to both. NZDF seeks relief that addresses the points above, including any such further alternative or consequential relief as may be necessary to fully give effect to this submission.

New Zealand Defence Force (cont.)			3.3	Planning maps	Support in part	Zoning maps showing the Obstacle Limitation Surfaces are provided in Appendix C of PC1. However, it is not clear whether these are for information purposes or whether they are showing proposed amendments to the pMEP planning maps. Showing only the runway protection area could leave plan users unclear about the separate extent and purpose of the OLS. NZDF seeks relief that addresses the points above, including any such further alternative or consequential relief as may be necessary to fully give effect to this submission.	NZDF requests that the OLS be shown on the ePlan planning maps so that plan users can readily identify their application at a property level. The maps should clearly distinguish the OLS from the “runway protection area”, which is already shown on the planning maps and is linked to rules relating to noise-sensitive activities.
			3.4	Designation approval s176(1)(b) Resource Management Act (RMA)	Support in part	The Section 32 Report states that PC1 will not apply retrospectively to existing frost fans that were lawfully established. However, it is important to distinguish the requirements of the frost fan rules from requirements associated with Designation A2. Under s176(1)(b) RMA, the effect of a designation is that no person may, without the prior written consent of the requiring authority, do anything in relation to the land that is subject to the designation that would prevent or hinder a public work or project or work to which the designation relates. The requirement to obtain requiring authority written consent under s 176(1)(b) RMA applies regardless of whether or not resource consent is required and/or obtained. While any frost fans already constructed that infringe the Base Woodbourne OLS may not have required resource consent, they may not have been lawfully established if they were constructed without written consent from the requiring authority.	NZDF seeks relief that addresses the submission, including any such further alternative or consequential relief as may be necessary to fully give effect to this submission.