

**In the Environment Court  
at Christchurch**

**ENV-2018-CHC-150**

**In the Matter**

of the Resource Management Act  
1991

**And**

**In the Matter**

of an appeal under Clause 14(1),  
Schedule 1 of the Act

**Between**

**DARBY PLANNING LIMITED**

Appellant

**And**

**QUEENSTOWN LAKES DISTRICT  
COUNCIL**

Respondent

**Notice of Queenstown Airport  
Corporation Limited's wish to be Party  
to Proceedings**

Dated: 10 July 2018

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**Lane Neave**  
Level 1, 2 Memorial Street  
PO Box 701  
Queenstown  
Solicitor Acting: Rebecca Wolt  
Email: [Rebecca.wolt@laneneave.co.nz](mailto:Rebecca.wolt@laneneave.co.nz)  
Phone: 03 450 1365

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**To:** The Registrar  
Environment Court  
Christchurch

1. Queenstown Airport Corporation Limited (**QAC**) wishes to be party to the following appeal on the Proposed Queenstown Lakes District Plan – Stage 1 (**Proposed Plan**):

*Darby Planning Limited v Queenstown Lakes District Council (ENV-2018-CHC-150) (Appeal)*

2. QAC made a submission and further submission about the subject matter of the Appeal.
3. QAC also has an interest in the proceedings that is greater than the interest that the general public has as QAC is the operator of Queenstown and Wanaka Airports which have or may have infrastructure in the District's landscapes.
4. QAC is not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991 (**Act**).
5. QAC is interested in part of the proceedings.
6. In particular, the parts of the proceedings QAC is interested in are:
  - (a) Objective 3.2.5.1;
  - (b) Objective 3.2.5.2;
  - (c) Policy 3.3.30;
  - (d) Policy 4.2.1.5;
  - (e) Policy 4.2.2.1;
  - (f) Proposed new provisions in Chapter 4 the purpose of which are to give effect to the NPS-UDC;
  - (g) Proposed new objective and policy suite in Chapter 6 to provide for the mapping of specific ONLs / ONFs and the specific scheduling of values and characteristics existing in each;

- (h) Policy 6.3.13;
- (i) Policy 6.3.12;
- (j) Policy 6.3.26; and
- (k) Assessment Matters 21.21.

7. QAC is interested in the following particular issues:

- (a) Ensuring the landscape provisions better recognise the hierarchy and terminology set out in Part 2 of the Act and have better regard to the Proposed Regional Policy Statement.
- (b) Ensuring the functional, technical, operational and/or safety related constraints of significant infrastructure, such as Queenstown and Wanaka Airports, are provided for as such constraints may necessitate the location of Airport infrastructure in areas that are recognised for their landscape, amenity or significant natural values. The adverse effects of such infrastructure cannot always be avoided, remedied or mitigated in these locations.
- (c) The manner in which the issues of reverse sensitivity is addressed in the Proposed Plan.

8. QAC **conditionally supports** the relief sought in the Appeal in relation to the provisions identified in paragraphs 6(a)-(d) and 6(g)-(k) above for the reasons stated in and to the extent it is consistent with the intent of QAC's original submission, its further submission and its notice of appeal dated 19 June 2018 (*ENV-2018-CHC-093*), and also to the extent that any new schedule which addresses the values and characteristics of the District's ONLs and ONFs is developed through a separate process which accords with the First Schedule to the Act. QAC generally considers that the parts of the Appeal it conditionally supports:

- (a) better recognise the hierarchy and terminology set out in Part 2 of the Act;
- (b) have better regard to the Proposed Regional Policy Statement;

- (c) achieve integrated management of the effects, use, development or protection of land and associated natural and physical resources of the District;
  - (d) promote the sustainable management of natural and physical resources;
  - (e) are the most appropriate way to achieve the purpose of the Act; and
  - (f) are otherwise in accordance with the relevant provisions of the Act, including Part 2.
9. QAC **opposes** the relief sought by the Appellant in relation to the provisions identified at paragraphs 6(e) and (f) above for the reasons stated in its original submission, its further submission and its notice of appeal. QAC generally considers that the relief sought in the Appeal:
- (a) does not provide sufficient opportunity for public participation, in particular in relation to provisions identified at paragraph 6(f);
  - (b) does not provide adequate protection for Queenstown and Wanaka Airports from reverse sensitivity effects, which should be avoided;
  - (c) does not recognise or provide for the Queenstown and Wanaka Airports as regionally significant infrastructure;
  - (d) does not make adequate provision for the ongoing operation, maintenance, upgrading and development of Queenstown and Wanaka Airports;
  - (e) does not adequately recognise the locational, functional, technical and operational requirements of Queenstown and Wanaka Airports, as regionally significant infrastructure, and that such requirements can mean that not all adverse effects can be avoided or mitigated;
  - (f) inappropriately conflates Part 2 matters, in parts;
  - (g) does not represent an efficient use of land under section 7(a);
  - (h) does not promote the sustainable management of natural and physical resources; and

(i) is otherwise not the most appropriate way to achieve the purpose of the Act.

10. QAC agrees to participate in mediation or other dispute resolution of the Appeal.

Dated this 10th day of July 2018



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Rebecca Wolt/Sophie Reese

Counsel for Queenstown Airport Corporation Limited

**Address for Service for the Appellant:**

Lane Neave  
Level 1, 2 Memorial Street  
PO Box 701  
Queenstown 9300  
Phone: 03 450 1365  
Email: [Rebecca.wolt@laneneave.co.nz](mailto:Rebecca.wolt@laneneave.co.nz)

Contact person: Rebecca Wolt