

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 **QUEENSTOWN PARK 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

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**):

Queenstown Park Limited v Queenstown Lakes District Council (ENV-2018-CHC-127) (Appeal)

2. QAC made a submission and further submission about the subject matter of the Appeal and also has an interest in the Appeal that is greater than the interest of the general public has as QAC is the operator of Queenstown and Wanaka Airports which have or may have infrastructure located in the District's rural landscapes.
3. In relation to provisions identified in paragraphs 6(e) and 6(g)-(k) below, QAC has an interest in the Appeal that is greater than the interest that the general public has as since the Proposed Plan was notified QAC has secured a long term lease for Wanaka Airport under which it is responsible for the planning, development and governance of the Airport. Wanaka Airport is regionally significant infrastructure that is located outside the District's defined Urban Growth Boundaries, however development of the Airport may comprise "urban development". The provisions addressed by the Appeal are therefore of direct relevance to Wanaka Airport, and have the potential to preclude or limit the efficient and effective upgrade and development of the Airport.
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) Planning Maps – rezoning request;
 - (b) Issue 2;
 - (c) Objective 3.2.1.3;
 - (d) Objective 3.2.5;

- (e) Policy 3.3.3;
- (f) Policy 3.3.30;
- (g) Objective 4.2.1;
- (h) Policy 4.2.1.3;
- (i) Policy 4.2.1.4;
- (j) Policy 4.2.1.5;
- (k) Policy 6.3.4;
- (l) Policy 6.3.12; and
- (m) Policy 6.3.16.

7. QAC is interested in the following particular issues:

- (a) Ensuring that the zoning of land in proximity to Queenstown Airport does enable activities that may affect the efficiency, effectiveness and safety operations at Queenstown Airport, or give rise to adverse amenity or reverse sensitivity effects.
- (b) 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.
- (c) 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 can not always be avoided, remedied or mitigated in these locations.

8. QAC **conditionally supports** the relief sought in the Appeal in relation to the provisions identified in paragraphs 6(b)-(m) 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*). 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 in the Appeal in relation to the provisions identified at paragraph 6(a) above for the reasons stated in its original submission, its further submission and its notice of appeal. QAC generally considers that the relief sought by the Appellant:
- (a) will have significant adverse effects on QAC that have not been adequately addressed in terms of section 32 of the Act;
 - (b) does not provide adequate protection for Queenstown Airport from reverse sensitivity effects;
 - (c) may give rise to adverse amenity effects as a result of aircraft noise;
 - (d) does not recognise or provide for Queenstown and Airport as regionally significant infrastructure;
 - (e) has the potential to significantly impact on the operation and functioning of Queenstown Airport;
 - (f) does not represent an efficient use of land under section 7(a);
 - (g) does not promote the sustainable management of natural and physical resources; and
 - (h) 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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