

**In the Environment Court
at Christchurch**

ENV-2019-CHC-029

Under the Resource Management Act 1991

And

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

Between **QUEENSTOWN COUNTRY CLUB
LIMITED AND QUEENSTOWN
COMMERCIAL LIMITED**

Appellants

And **QUEENSTOWN LAKES DISTRICT
COUNCIL**

Respondent

**Notice of Queenstown Airport
Corporation Limited's wish to be party
to proceedings**

Dated: 5 June 2019

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

lane neave.

To: The Registrar
Environment Court
Christchurch

1. Queenstown Airport Corporation Limited (**QAC**) wishes to be a party to the following appeal against parts of the Respondent's decisions on the Proposed Queenstown Lakes District Plan – Stage 2 (**Proposed Plan**):
 - (a) *Queenstown Country Club Limited and Queenstown Commercial Limited v Queenstown Lakes District Council* (ENV-2019-CHC-029) (**Appeal**).
2. QAC made a submission about the subject matter of the Appeal.
3. QAC also has an interest in the Appeal that is greater than the interest that the general public has because QAC owns and operates the nationally significant Queenstown Airport (**Airport**). The relief sought in the Appeal relates to land in proximity to the Airport and may impact QAC's ability to efficiently operate the Airport, and to manage its growth.
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 all of the Appeal.
6. QAC is interested in the following particular issue:
 - (a) the amendments sought to Planning Maps 30 and 30a to rezone land from Rural to Lower Density Suburban Residential or Medium Density Residential, or any similar urban zoning, and any related amendments, in so far as the zoning and/or amendments may enable the establishment and/or intensification of Activities Sensitive to Aircraft Noise (**ASAN**) in proximity to the Airport.
7. QAC **opposes** the relief sought in the Appeal for the reasons set out in its original and further submissions and its notice of appeal dated 7 May 2019 (ENV-CHC-2019-039). QAC is concerned that the relief sought:
 - (a) may enable the establishment and/or intensification of ASAN in proximity to the Airport, which may result in:
 - (i) adverse reverse sensitivity effects on the Airport; and/or

- (ii) adverse amenity effects due to aircraft noise;
 - (b) may impose undue constraints on legitimate and necessary activities undertaken at the Airport, including the ongoing operation, maintenance, upgrading and development of the Airport;
 - (c) does not represent sound resource management practice, particularly with respect to planning for Regionally Significant Infrastructure, such as the Airport, in the District;
 - (d) fails to achieve the functions of the Respondent under section 31 of the Act in respect of the integrated management of the effects of the use and development of land and physical resources;
 - (e) does not represent an efficient use of resources under section 7(b); and
 - (f) is not the most appropriate way to achieve the objectives of the Proposed Plan and, in turn, the purpose of the Act.
8. QAC agrees to participate in mediation or other alternative dispute resolution of the Appeal.

Dated this 5th day of June 2019



Rebecca Wolt/Annabel Linterman
Counsel for Queenstown Airport Corporation Limited

Address for Service of Queenstown Airport Corporation Limited:

Phone: 03 450 1365/03 377 6873

Email: rebecca.wolt@laneneave.co.nz/annabel.linterman@laneneave.co.nz

Contact person: Rebecca Wolt/Annabel Linterman