

In the Environment Court
at Christchurch

ENV-2021-CHC-056

In the Matter

of the Resource Management Act
1991

And

In the Matter

of an appeal under clause 14(1) of
the First Schedule to the Act

Between

QUARTZ COMMERCIAL GROUP
LIMITED

Appellant

And

QUEENSTOWN LAKES DISTRICT
COUNCIL

Respondent

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

Dated: 16 June 2021

Counsel Acting | Rebecca Wolt
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To: The Registrar
Environment Court
Christchurch

1. Queenstown Airport Corporation Limited (**QAC**) wishes to be a party to the following appeal against the Respondent's decisions on the Proposed Queenstown Lakes District Plan – Stages 3 and 3B (**Proposed Plan**).

(a) *Quartz Commercial Group Limited v Queenstown Lakes District Council* (ENV-2021-CHC- 056) (**Appeal**)
2. QAC made submissions and further submissions on Stages 1 and 2 of the Proposed Plan in respect of the Low Density Suburban Residential (**LDSR**) zone, being the subject matter of the Appeal.
3. QAC also has an in the Appeal that is greater than the interest the general public has as the operator of Queenstown Airport, which the Proposed Plan recognises as Regionally Significant Infrastructure. The wider relief sought in the Appeal may impact land zoned Low Density Suburban Residential (**LDSR**) (Visitor Accommodation Subzone) that is in proximity to Queenstown Airport and may impact the safe and efficient operation of the Airport.
4. QAC is not a trade competitor for the purposes of section 308D of the Resource Management Act (**Act**).
5. QAC is interested in **part** of the Appeal.
6. The part of the Appeal that QAC is interested in is:

(a) Provision for informal airports within the LDSR Visitor Accommodation Subzone.
7. QAC is interested in the following particular issue:

(a) Land proximate to Queenstown Airport is zoned LDSR (Visitor Accommodation Subzone). Should the relief sought in the appeal have zone wide application, such that informal airports are enabled on this land proximate to the Airport, the ability of the Airport to operate safely and efficiently may be compromised.

8. QAC **opposes** the relief sought in the Appeal in respect of informal airports, to the extent that it may have zone wide application and/or impact land proximate to Queenstown Airport. QAC is concerned that the relief:
- (a) may impose undue constraints on legitimate and necessary activities undertaken at Queenstown Airport, including the ongoing and safe operation, maintenance, upgrading and development of the Airport;
 - (b) does not represent sound resource management practice, particularly in regards to planning for Regionally Significant Infrastructure, such as Queenstown Airport, in the District;
 - (c) fails to achieve the functions of the Respondent under section 31 of the Act in regards to the integrated management of the effects of the use and development of land and physical resources;
 - (d) does not represent efficient use of physical resources under section 7(b) of the Act;
 - (e) does not promote the sustainable management of natural and physical resources;
 - (f) is otherwise not the most appropriate way to achieve the objectives of the Proposed Plan and, in turn, the purpose of the Act.
9. QAC agrees to participate in mediation or other dispute resolution of the Appeal.

Dated this 16th day of June 2021



Rebecca Wolt

Counsel for Queenstown Airport Corporation Limited

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