## In the Environment Court at Christchurch

## ENV-2018-CHC-087

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 HOUSE MOVERS SECTION OF

NEW ZEALAND HEAVY HAULAGE ASSOCIATED INCORPORATED

Appellant

And QUEENSTOWN LAKES DISTRICT

COUNCIL

Respondent

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

Dated: 10 July 2018

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

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

House Movers Section of New Zealand Heavy Haulage Associated Incorporated v Queenstown Lakes District Council (ENV-2018-CHC-087) (Appeal)

- QAC made a further submission about the subject matter of the Appeal. QAC also has an interest in the Appeal that is greater than the interest that the general public has as the relief sought has the potential to impact Queenstown Airport's operations.
- QAC is not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991 (Act).
- 4. QAC is interested in all of the Appeal.
- 5. QAC is interested in the following particular issues:
  - (a) The extent to which the relief sought in the Appeal my circumvent the restrictions and controls placed on noise sensitive activities (**ASAN**) elsewhere in the Proposed Plan, and may result in adverse amenity and/or reverse sensitivity effects where relocated buildings are located in proximity to Queenstown or Wanaka Airports.
- 6. QAC opposes the relief sought in the Appeal for the reasons stated in its original submission, further submission and its notice of appeal. QAC opposes the relief to the extent that it may result in the circumvention of restrictions and controls on ASAN contained elsewhere in the Proposed Plan. QAC generally considers that the relief sought in the Appeal:
  - (a) does not provide adequate protection for the Queenstown and Wanaka Airports from reverse sensitivity effects;
  - (b) may give rise to adverse amenity effects are a result of aircraft noise;

- does not recognise or provide for Queenstown and Wanaka Airports as regionally significant infrastructure;
- (d) does not recognise or provide for the ongoing predicted or likely growth in operations and passenger numbers at the Airports;
- (e) does not make adequate provision for the ongoing operation, maintenance, upgrading and development of the Airports;
- (f) 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;
- (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.
- QAC agrees to participate in mediation or other dispute resolution of the Appeal.

Dated this 10th day of July 2018

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

Contact person: Rebecca Wolt