

<b>In the Matter</b>	of the Resource Management Act 1991
<b>And</b>	
<b>In the Matter</b>	of an appeal under Clause 14(1), Schedule 1 of the Act
<b>Between</b>	<b>REAL JOURNEYS (TRADING AS GO ORANGE LIMITED)</b>
	Appellant
<b>And</b>	<b>QUEENSTOWN LAKES DISTRICT COUNCIL</b>
	Respondent

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

Dated: 10 July 2018

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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**):

*Real Journeys (trading as Go Orange Limited) v Queenstown Lakes District Council (ENV-2018-CHC-138) (Appeal)*

2. QAC made a submission and further 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 as QAC is the operator of Queenstown and Wanaka Airports, both of which are regionally significant infrastructure and have or may have infrastructure located 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 Appeal.
6. In particular, the parts of the Appeal QAC is interested in are:
  - (a) Policy 3.3.25;
  - (b) Rule 21.4.28;
  - (c) Policy 21.2.7.1; and
  - (d) 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 infrastructure in the District's Landscapes.

The adverse effects of such infrastructure cannot always be avoided, remedied or mitigated in these locations.

- (c) Ensuring the Queenstown and Wanaka Airports are afforded adequate protection against reverse sensitivity effects.

8. QAC **conditionally supports** the relief sought in the Appeal in relation to the provisions identified in paragraphs 6(a) and 6(d) 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 paragraphs 6(b) and (c) 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) is inconsistent with best practice land use management around Airports;
- (b) is inconsistent with the NZ Standards for Airport Noise Management and Land Use Planning;
- (c) does not give effect to the higher order objectives and policies of the Proposed Plan regarding reverse sensitivity effects;

- (d) does not provide adequate protection for Queenstown and Wanaka Airports from reverse sensitivity effects;
  - (e) does not recognise or provide for Queenstown and Wanaka Airports as regionally significant infrastructure;
  - (f) has the potential to significantly impact on the operation and functioning of Queenstown and Wanaka Airports;
  - (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



Rebecca Wolt/Sophie Reese

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