

In the Environment Court
at Christchurch

ENV-2021-CHC- 043

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

**86 BALLANTYNE ROAD
PARTNERSHIP**

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) *86 Ballantyne Road Partnership v Queenstown Lakes District Council* (ENV-2021-CHC- 043) (**Appeal**)

2. QAC made a submission (OS3316) about the subject matter of the Appeal.

3. QAC also has an interest 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 broader relief sought in the Appeal relates to land in proximity to Queenstown Airport and may impact QAC's ability to operate the Airport efficiently, and to manage its growth.

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 parts of the Appeal that QAC is interested in are:

(a) The primary relief to amend the provisions of the General Industrial Zone (**GIZ**), including the specific amendments to the provisions set out in Appendix 1 to the Appeal, and any additional or consequential relief.

7. QAC is interested in the following particular issues:

(a) The zone wide amendments sought to the GIZ, in so far as they may enable or facilitate the establishment of activities in the GIZ adjacent to Queenstown Airport that are incompatible with operations and activities at the Airport, including, in particular, Activities Sensitive to Aircraft Noise (**ASAN**), and may give rise to reverse sensitivity effects on, and/or unduly constrain the ongoing operation, maintenance, upgrading and development of, the Airport.

8. QAC **opposes** the relief sought in the Appeal for the reasons stated above, and in its original submission and notice of appeal (ENV-2021-CHC-048). QAC is concerned that the relief:

- (a) is inconsistent with the New Zealand Standard for Airport Noise Management and Land Use Planning, NZS 6805;
- (b) may impose undue constraints on legitimate and necessary activities undertaken at Queenstown Airport, including the ongoing operation, maintenance, upgrading and development of the Airport;
- (c) does not represent sound resource management practice, particularly in regards to planning for Regionally Significant Infrastructure, such as Queenstown Airport, in the District;
- (d) 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;
- (e) does not represent efficient use of physical resources under section 7(b) of the Act;
- (f) does not promote the sustainable management of natural and physical resources;
- (g) 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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