

**IN THE ENVIRONMENT COURT
AT CHRISTCHURCH**

**ENV-2019-CHCH-00071
ENV-2019-CHCH-00072**

UNDER THE Resource Management Act 1991 ("**Act**")

IN THE MATTER OF an appeal under clause 14(1) of Schedule 1 of the
RMA in relation to the proposed Queenstown
Lakes District Plan

BETWEEN **ANDREW FAIRFAX**

Appellant ENV-2019-CHCH-00071

AND **AIRCRAFT OWNERS AND PILOTS
ASSOCIATION (NZ) INCORPORATED**

Appellant ENV-2019-CHCH-00072

AND **QUEENSTOWN LAKES DISTRICT COUNCIL**

Respondent

**NOTICE OF CLIVE MANNERS WOOD'S
WISH TO BE PARTY TO PROCEEDINGS**

4 JUNE 2019

Counsel instructed:

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WELLINGTON

TO: The Registrar
 Environment Court
 PO Box 2069
 20 Lichfield Street
CHRISTCHURCH
 (Christine.McKee@justice.govt.nz)

AND TO: The Appellants
 By email: maree.baker-galloway@al.nz;
roisin.giles@al.nz

AND TO: The Respondent
 By email: dpappeals@qldc.govt.nz

Notice

1. Clive Manners Wood ("**s274 Party**") wishes to be a party to the appeals by:
 - (a) *Andrew Fairfax* ("**Fairfax**") v *Queenstown Lakes District Council* ("**Council**") ENV-2019-CHCH-00072 ("**Fairfax Appeal**"); and
 - (b) *Aircraft Owners and Pilots Association (NZ) Incorporated* ("**AOPA**") v *Queenstown Lakes District Council* ("**Council**") ENV-2019-CHCH-00072 ("**AOPA Appeal**");

together, the "**Appeals**".

Jurisdiction

2. The s274 Party made a submission on Stage 1 of the Queenstown Lakes District Proposed District Plan ("**PDP**") on or around 22 October 2015, and a further submission on 18 December 2015 ("**original submissions**"). The original submissions, and the s274 Party's subsequent appeal in respect of Stage 1 (ENV-2018-CHC-057-001) are deemed to be submissions and an appeal, respectively, against the relevant provisions of Stage 2 substituted by way of variation under Stage 2.
3. For completeness, the s274 Party also lodged an appeal against the Stage 2 decisions, *Clive Manners Wood v Queenstown Lakes District Council* ENV-2019-CHCH-00064 ("**Stage 2 Wood appeal**").
4. The original submissions and the Stage 2 Wood appeal raise matters that are the subject of the Appeals.

No trade competition

5. The s274 Party is not a trade competitor for the purpose of Section 308C or 308CA of the Act.

Extent of interest in the proceedings

6. The s274 Party is interested in all of each of the Appeals.

7. The s274 Party is particularly interested in all the parts of the Appeals that relate to informal airports, including the policies, rules, standards and outcomes including in respect of amenity, character, and cumulative effects considerations arising from informal airports.


Relief sought

8. The s274 Party generally opposes the relief sought in the Appeals, and particularly to the extent that the relief sought is inconsistent with the relief sought in the s274 Party's original submissions and the Stage 2 Wood Appeal.
9. The s274 Party seeks the relief sought in the s274 Party's original submissions and the Stage 2 Wood Appeal, for the reasons stated therein.

Mediation

10. The s274 Party agrees to participate in mediation or other alternative dispute resolution of the Appeals. Similar issues were resolved through mediation of the Stage 1 appeals.

DATED 4 June 2019



J D K Gardner-Hopkins
Counsel for the s274 Party

The s274 Party's address for service is C/- James Gardner-Hopkins, Barrister, PO Box 25-160, Wellington 6011.

Documents for service on the s274 Party may be sent to that address for service or may be emailed to james@jghbarrister.com. Service by email is preferred, with receipt confirmed by return email.