

In the Environment Court
at Christchurch

ENV-2021-CHC- 051

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 SCHIST HOLDINGS 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
Email | rebecca@rebeccawolt.co.nz
Phone | 021 244 2950

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) *Schist Holdings Limited v Queenstown Lakes District Council* (ENV-2021-CHC-051) (**Appeal**)

2. QAC made a submission (OS3316) and further submission (FS3436) 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 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 **all** the Appeal.

6. QAC is interested in the following particular issue:

(a) The extent to which the relief sought in the appeal may have the unintended consequence of diluting the protection afforded to Queenstown Airport against the establishment of activities within the adjacent General Industrial Zone that are incompatible with airport operations and activities, and may facilitate or enable those activities, 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, development and upgrade of Queenstown Airport.

7. QAC **opposes** the relief sought in the Appeal for the reasons stated in its original submission, its further submission and its notice of appeal dated 18 May 2021 (ENV-2021-CHC-048). QAC is concerned that the relief:
- (a) may impose undue constraints on legitimate and necessary activities undertaken at Queenstown Airport, including the ongoing 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.
8. 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

Address for Service for the Appellant:

Rebecca Wolt
Barrister
Phone: 021 244 2950
Email: rebecca@reccawolt.co.nz