

**In the Environment Court
at Christchurch**

ENV-2018-CHC-124

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

**WATERFALL PARK
DEVELOPMENT LIMITED**

Appellant

And

**QUEENSTOWN LAKES DISTRICT
COUNCIL**

Respondent

**Notice of Trojan Helmet Limited's wish
to be Party to Proceedings**

Dated: 10 July 2018

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To: The Registrar
Environment Court
Christchurch

1. Trojan Helmet Limited (**THL**) wishes to be party to the following appeal on the Proposed Queenstown Lakes District Plan – Stage 1 (**Proposed Plan**):

Waterfall Park Developments Limited v Queenstown Lakes District Council (ENV-2018-CHC-124) (Appeal)

2. THL made a submission which touched on the provision for resorts in the Proposed Plan, and has an interest in the Appeal that is greater than the interest the general public has because it has made submissions on Stage 1 and Stage 2 of the Proposed Plan seeking a resort zoning of its property, and because it has filed an appeal on Stage 1 of the Proposed Plan in which it seeks the recognition of and provision for resorts in the higher order chapters of the Proposed Plan (*ENV – 2018-CHC-092*).
3. THL is not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991 (**Act**).
4. THL is interested in part of the proceedings.
5. In particular, the parts of the proceedings THL is interested in is:
 - (a) the proposed amendments to the definition of “urban development”;
and
 - (b) the proposed deletion of the definition of “resort”.
6. THL is interested in the following particular issues:
 - (a) The issues raised at paragraphs 12 – 18 of the Appeal.
7. THL **opposes** the relief sought by the Appellant in relation to the issues identified in paragraphs 5 and 6 above for the following reasons:
 - (a) it is appropriate that the Proposed Plan distinguishes between “resort development” and “urban development” because resort development may be appropriate in rural locations where other urban development would be inappropriate, especially when considering that activities

such as golf courses associated with resort developments may require a rural location.

- (b) the relief sought by the Appellant:
 - (i) fails to achieve the functions of the Respondent under section 31 of integrated management of the effects of the use and development of land and physical resources;
 - (ii) does not represent an efficient use of land under section 7(a); and
 - (iii) fails to promote sustainable management of resources and will not achieve the purpose of the Act.
- (c) otherwise for the reasons set out in THL's submission, further submission, and notice of appeal.

8. THL agrees to participate in mediation or other dispute resolution of the proceedings.

Dated this 10th day of July 2018



Rebecca Wolt
Counsel for Trojan Helmet Limited

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