

In the Environment Court of New Zealand
Christchurch Registry

I Te Koti Taiao o Aotearoa
Ōtautahi Rohe

ENV-2018-CHC-000061

Under	the Resource Management Act 1991 (RMA)
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	Alexander Schrantz and Jayne Schrantz Appellant
And	Queenstown Lakes District Council Respondent

Notice of Jacks Point and others' wish to be party to proceedings pursuant to section 274 RMA

10 July 2018

Section 274 party's solicitors:

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**anderson
lloyd.**

To: The Registrar
Environment Court
Christchurch

- 1 Jacks Point Residential No.2 Ltd, Jacks Point Village Holdings Ltd, Jacks Point Developments Limited, Jacks Point Land Limited, Jacks Point Land No. 2 Limited, Jacks Point Management Limited, Henley Downs Land Holdings Ltd, Henley Downs Farms Holdings Ltd, Coneburn Preserve Holdings Limited, Willow Pond Farm Limited (**Jacks Point and others**) wish to be a party pursuant to section 274 of the RMA to the following proceedings:

Alexander Schrantz and Jayne Schrantz v QLDC (ENV-2018-CHC-000061) being an appeal against decisions of Queenstown Lakes District Council on the proposed Queenstown Lakes District Plan (**PDP**).

- 2 Jacks Point and Others is a person who made a submission about the subject matter of the proceedings.
- 3 Jacks Point and Others is not a trade competitor for the purposes of section 308C or 308CA of the RMA.
- 4 Jacks Point and Others is interested in all of the proceedings and opposes all the relief sought as being inconsistent with the weight of expert evidence, and the Objective of the Jacks Point Zone.
- 5 Without derogating from the above, Jacks Point is interested in the following particular issues:

Chapter 41 Jacks Point Zone

- (a) New policy in respect of the Peninsula Hill Landscape Protection Area
 - (i) Jacks Point and Others opposes this relief as while the addition of a new policy specific to the Peninsula Hill Landscape Protection Area is supported in principle, any new policy for the Peninsula Hill Landscape should also recognise areas within this landscape which are appropriate to absorb a limit amount of development through the identification of additional Homesites.
- (b) A change to the activity status for buildings (other than farm buildings) and activities such as visitor accommodation in the Peninsula Hill Landscape Protection Area as well as in the Tablelands OSG to non-complying.
 - (i) Jacks Point and Others oppose this relief because elevation of the status for buildings within the Peninsula Hill Landscape Protection

Area would only have merit where it is accompanied by a suite of provisions that also recognise areas of this landscape with greater capacity to absorb change through the identification of further home site activity areas. Elevation of the status of visitor accommodation within the Peninsula Hill Landscape Protection Area, Tablelands overlay or Activity Area OSG is unjustified and unsupported.

(c) Removal of Homesite Activity Areas

- (i) Jacks Point and Others oppose this relief because removal of the additional Homesites within the Preserve is contrary to the expert evidence that each area has been identified through detailed landscape analysis and are supported as appropriate. These Homesites are considered appropriate and consistent within relevant objectives of the Jacks Point Zone and higher order provisions of the Proposed District Plan.

(d) Removal of Urban Growth Boundary

- (i) Jacks Point and Others oppose this relief because the removal of the Urban Growth Boundary from Peninsula Hill Landscape Protection Area is opposed on the basis that it provides an appropriate growth management tool and as there are no primary submissions made to provide scope for the removal of such.

Chapter 27 Subdivision

- (e) Amendments to Subdivision policies and/or inclusion of additional policies in respect of the Peninsula Hill Landscape Protection Area, together with a change to subdivision within that area to non-complying (other than in respect of boundary adjustments).

- (i) Jacks Point and Others opposes this relief because strong controls already exist to control the effects of subdivision, use or within the Peninsula Hill Landscape Protection Area.

- 6 Jacks Point and Others agree to participate in mediation or other alternative dispute resolution of the proceedings.

Dated this 10th day of July 2018

Maree Baker-Galloway

Maree Baker-Galloway/Rosie Hill
Counsel for the section 274 party

Address for service of person wishing to be a party

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Advice

If you have any questions about this notice, contact the Environment Court in Christchurch.