



FORM 6: FURTHER SUBMISSION

IN SUPPORT OF, OR IN OPPOSITION TO,
SUBMISSION ON A NOTIFIED PLAN CHANGE,
VARIATION OR PROPOSED POLICY STATEMENT



Clause 8 of Schedule 1, Resource Management Act 1991



TO // Queenstown Lakes District Council

Name of submitter [full name] Wayne Foley for Koko Ridge Limited



FURTHER SUBMISSION // In support of (or opposition to) a submission on the following:

Te Putahi Ladies Mile plan variation dated 27 April 2023

I AM [state whether you are]

A person representing a relevant aspect of the public interest; or

[in this case, also specify the grounds for saying that you come within this category]

A person who has an interest in the proposal that is greater than the interest the general public has; or

[in this case, also explain the grounds for saying that you come within this category]
Koko Ridge Ltd is owner of land within the land subject of variation proposal

The local authority for the relevant area.



I SUPPORT (OR OPPOSE) // The submission of:

[Include: name and address of original submitter and submission number of original submission if available]

I partly support and partly oppose the submission of Waka Kotahi



THE PARTICULAR PARTS // Of the submission I support (or oppose) are:

[clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal]

SEE ATTACHED SUBMISSION

THE REASONS // For my support (or opposition) are:

[give reasons]

I oppose the submission for the reasons as set out in the attached submission.

**I SEEK** // That the whole (or part [describe part]) of the submission be allowed (or disallowed):

[give precise details]

I seek that the whole of the submission be disallowed as set out in the attached submission form.

I wish / do not wish*

to be heard in support of my further submission.

I will / will not*

consider presenting a joint case with others presenting similar submissions.

* Select one.

SIGNATURE

**Signature

[or person authorised to sign on behalf of submitter]

AUTHORISED TO SIGN ON BEHALF
OF KOKO RIDGE LTD

Date 3 August 2023

** A signature is not required if you make your submission by electronic means.

YOUR DETAILS // Our preferred methods of corresponding with you are by emailElectronic address for service of submitter [email] kristy.rusher@awslegal.co.nz

Telephone [work] 03 211 9036 DDI

[home]

[mobile] 021 400 133

Postal Address
[or alternative method of service
under section 352 of the Act] AWS Legal
80 Don Street
InvercargillPost code
9840

Contact person [name and designation, if applicable] Kristy Rusher, solicitor for Koko Ridge Limited

NOTE // To person making further submission**A copy of your further submission must be served on the original submitter within 5 working days after it is served on the local authority.**

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- > it is frivolous or vexatious:
- > it discloses no reasonable or relevant case:
- > it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- > it contains offensive language:
- > it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.



Ref: Kristy Rusher
Email: Kristy.Rusher@awslegal.co.nz

3 August 2023

Queenstown Lakes District Council

By email: pdpsubmission@qldc.govt.nz

Dear Sir/Madam

FURTHER SUBMISSION BY WAYNE FOLEY AND KOKO RIDGE LIMITED

Wayne Foley and Koko Ridge Ltd (the Submitter) made submissions (OS80.1-OS80.19) on the proposed variation to the Queenstown-Lakes District plan Te Putahi Ladies Mile Masterplan (Variation 1).

This is a further submission by the Submitter on Variation 1.

The Submitter's further submissions, reasons for submissions and decision sought are set out in appendix 1 **attached**.

The relief sought by the submitters with respect to the further submission is also set out in Appendix 1 attached, and:

- Will achieve the purpose and principles of the Resource Management Act 1991.
- Promotes the sustainable management of resources
- Represents the most appropriate way to achieve the objectives and policies of the Queenstown-Lakes District plan.
- Will enable the integrated use, management and development of land.
- Will give effect to the national policy statement on urban development.

The Submitter wishes to be heard and support of this further submission and will not consider presenting a joint case with any other person with a similar or related interest.

AWS Legal

per



K L Rusher

Appendix 1 – Further Submission of Wayne Foley for Koko Ridge Limited on Submission of Waka Kotahi (submitter 104)

Name of Original Submitter (and Submission Number)	Submission Point	Further Submitters' support/oppose	Reason for Further Submitters' support/opposition	Decision Sought by Further Submitters
Waka Kotahi (#104)	OS104.1	Support	Infrastructure that supports efficient networks and modal shifts are supported by the submitter.	Grant the relief
Waka Kotahi (#104)	OS104.3	Oppose	The submitter considers that the development of the zone should not be prevented by the construction or project parameters of Waka Kotahi, due to the considerable uncertainty of project approvals. Modal shift is available as a solution with existing infrastructure..	Decline the relief.
Waka Kotahi (#104)	OS104.14	Oppose	The submitter considers that the development of the zone should not be prevented by the construction or project parameters of Waka Kotahi, due to the considerable uncertainty of project approvals. Modal shift is available as a solution with existing infrastructure.	Decline the relief.

Appendix 1 – Further Submission of Wayne Foley for Koko Ridge Limited on Submission of Waka Kotahi (submitter 104)

Name of Original Submitter (and Submission Number)	Submission Point	Further Submitters' support/oppose	Reason for Further Submitters' support/opposition	Decision Sought by Further Submitters
Waka Kotahi (#104)	OS104.14	Oppose	The submitter considers that the development of the zone should not be prevented by the construction or project parameters of Waka Kotahi, due to the considerable uncertainty of project approvals. Modal shift is available as a solution with existing infrastructure.	Decline the relief.
Waka Kotahi (#104)	OS104.15	Support	The submitter considers that the rule does not need to specify whether a crossing is provided for above or below the level of the State Highway. This rule should be drafted in a manner that provides flexibility for crossing the State Highway to the extent that it is consistent with the submitter's outcomes sought.	Decline the relief.

Appendix 1 – Further Submission of Wayne Foley for Koko Ridge Limited on Submission of Waka Kotahi (submitter 104)

Name of Original Submitter (and Submission Number)	Submission Point	Further Submitters' support/oppose	Reason for Further Submitters' support/opposition	Decision Sought by Further Submitters
Waka Kotahi (#104)	OS104.20	Support	The submitter considers that the rule should provide for the structure plan being an indicative outline so that improvements to the structure plan can be made.	Grant the relief
Waka Kotahi (#104)	OS104.26	Support	The submitter seeks to be involved in any future process assessing and determining the parking provisions, particularly as they concern residential parking areas and provision for boats, caravans and other vehicles.	Grant the relief to the extent that it is consistent with the submitter's preferred relief.
Waka Kotahi (#104)	OD104.33	Support	The submitter seeks that there are a variety of methods to provide for the efficient movement of people and vehicles.	Grant the relief to the extent that it is consistent with the submitter's preferred relief.