BEFORE THE ENVIRONMENT COURT
ENV-2018-CHC-137

| IN THE MATTER | of the Resource Management Act 1991 <br> (the Act) |
| :--- | :--- |
| AND |  |
| IN THE MATTER | of an appeal pursuant to Clause 14 of the <br> First Schedule of the Act |
| BETWEEN | Jacks Point Residential No.2 Ltd, Jacks <br> Point Village Holdings Ltd, Jacks Point <br> Developments Limited, Jacks Point Land <br> Limited, Jacks Point Land No. 2 Limited, <br> Jacks Point Management Limited, Henley |
|  | Downs Land Holdings Ltd, Henley Downs <br> Farms Holdings Ltd, Coneburn Preserve <br> Holdings Limited, Willow Pond Farm <br> Limited |
| Appellant |  |

TO: The Registrar
Environment Court
CHRISTCHURCH

1. Name of party giving notice:

Southern Beaver Limited (SBL)
c/o Clark Fortune McDonald \& Associates
PO Box 553
Queenstown 9348
Attn: Nick Geddes
2. The relevant proceedings are:

ENV-2018-CHC-137
3. The party giving notice is:

SBL made a submission (\#342) on Chapter 41 of the notified Proposed Queenstown Lakes District Plan (PDP).

SBL is also a person who has an interest in the Appeal that is greater than the interest that the general public has, in that SBL operates consented gravel extraction and on-site processing activities along with the disposal of clean fill activity from land directly affected by the PDP provisions the subject of the Appeal. These activities include two consented Diagram D intersections with State Highway 6.

SBL is not a trade competitor for the purposes of section 308C of the Act.
4. The relief sought is opposed.

The relief sought by the Appellant is not consistent with the higher order provisions of the PDP, other relevant policy and planning documents and the sustainable management purpose of the Act.

The relief the appeal seeks increases the Jacks Point Village by area and intensity. It includes an Education Innovation Campus. Both of these will generate additional traffic movements on the State Highway network.

As the operator of activities through two consented intersections with State Highway 6, SBL has an interest in relief that has the potential to impact its existing and future activities.
5. The party giving notice agrees to participate in mediation or alternative dispute resolution of the proceedings.


NT McDonald
for Southern Beaver Limited

Date:
$6^{\text {th }}$ July 2018
coo Nick Geddes
Clark Fortune McDonald \& Associates
PO Box 553
Queenstown 9348

