

In the Environment Court of New Zealand  
Christchurch Registry

I Te Koti Taiao o Aotearoa  
Ōtautahi Rohe

**ENV-2018-CHC-000056**

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Under	the Resource Management Act 1991 ( <b>RMA</b> )
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	<b>Upper Clutha Environmental Society Inc</b> Appellant
And	<b>Queenstown Lakes District Council</b> Respondent

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

10 July 2018

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**Section 274 party's solicitors:**

Maree Baker-Galloway | Rosie Hill  
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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:

*Upper Clutha Environmental Society Inc v QLDC (ENV-2018-CHC-000056)* 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.
- 5 Without derogating from the generality of the above, Jacks Point and others is interested in the following particular issue:

**Chapter 21 Rural Zone / Chapter 27 Subdivision**

- (a) All objectives, policies, assessment matters and rules and other provisions that relate to subdivision and/or development from the Operative District Plan Rural General zone are rolled over and included in the Stage One Proposed District Plan
- (i) Jacks Point and others opposes the relief sought because the proposed changes are too broad to properly understand the nature and effect of the proposed changes and they will, or could, fail to implement the higher order objectives of the PDP.

**Chapter 21 Rural Zone**

- (a) Rules 21.4.9 and 9a and Rules 21.4.10 and 10a
- (i) Jacks Point and others opposes the relief sought because the proposed change of the status of rural subdivision and/or development within the outstanding natural landscapes and features from discretionary to non-complying fails to appropriately recognise

the benefits to the District of such activities and to implement the higher order objectives of the PDP.

### **Planning Maps**

- (a) The landscape lines shown on the Operative District Plan maps are rolled-over in their current form into the Stage One Proposed District Plan.
  - (i) Jacks Point and others opposes the relief sought because rolling over all of the landscape lines from the operative District Plan fails to appropriately recognise and provide for s 6(b) of the Act and fails to recognise the extent to which such lines have been the subject to further investigation, including by the Council through the preparation of the Proposed District Plan.
- 6 Jacks Point and others agrees to participate in mediation or other alternative dispute resolution of the proceedings.

Dated this 10<sup>th</sup> day of July 2018

*Maree Baker-Galloway*

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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.