

**BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL HEARING PANEL**

**IN THE MATTER** of the Resource Management Act  
1991

**AND** the renotification of two submissions  
on Stage 1 of the Queenstown Lakes  
Proposed District Plan concerning the  
zoning of land at Arthur's Point by  
Gertrude's Saddlery Limited and  
Larchmont Developments Limited

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**MEMORANDUM OF RESPONSE FROM FURTHER SUBMITTERS SONJA KOOY  
AND JOHN GAVIN**

**Dated 21 February 2023**

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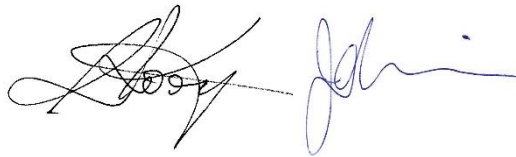
## **MAY IT PLEASE THE PANEL**

1. This memorandum is filed on behalf of the Sonja Kooy and John Gavin in response to the Memorandum of the Submitters dated 8<sup>th</sup> February 2023 and Memorandum of Counsel enclosing Submitters' reply information dated 16<sup>th</sup> February.
2. We refer to Memorandum of Counsel on behalf of Gertrude's Saddlery Limited and Larchmont Enterprises Limited dated 8<sup>th</sup> February Paragraph 4 where the Submitters table new simulations from within Shotover Gorge using the methodology presented for simulations shown in their document [appendix-a-gorge-exports-model-08-02-23.pdf](#). We feel these simulations are flawed as the methodology has not been proven to be accurate in this type of use. There has not been time to evaluate this methodology for their proposed purpose in the timeframe allowed. We have found in other cases these simulations have had a large margin of error especially when taking into consideration tolerances. We do not agree the methodology shows the true depiction of effects of development on this site from below on the Shotover ONF or any direction.
3. Paragraph 12 (b) in the Memorandum of Counsel enclosing Submitters' reply information dated 16<sup>th</sup> February refers to consent RM130588. This consent is irrelevant as the number of sites proposed in the structure plan is not the same.
4. The changes to the zone rules suggested by the Submitters in their Memorandum dated the 16<sup>th</sup> February will affect our amenity of privacy and access not just for us but for the whole community.
5. Whether access is being considered as part of this mediation or around the boardroom as suggested by the submitter safety should not be compromised. With additional bike trails included in their proposed structure plan safety needs to be paramount in the access road design for both ends of Atley Road. The number of bikes, pedestrians and winter restrictions have not been taken into consideration in any modelling or calculations.
6. If topography constrains what can be done in regards to access then this should be taken into consideration when considering additional development.
7. The revised zone rules will inflict additional monitoring on the council when the council has already proven it does not have the capacity to cope with monitoring it already needs to do. History has proven Gertrude Saddlery and

Larchmont Development do not follow the rules so constant monitoring and enforcement will be necessary.

8. Even with the changes made to the Structure Plan it will impact the ONF and amenity of what Arthurs Point is. It is too prominent to be a site with any housing intensification. The changes made to the Structure Plan in the Submitters Memorandum of the 16<sup>th</sup> February does not address this.

Dated this 21st day of February 2023

Handwritten signatures of Sonja Kooy and John Gavin in blue ink. The signature on the left is 'Sonja Kooy' and the signature on the right is 'John Gavin'.

**Sonja Kooy & John Gavin**