

BEFORE THE ENVIRONMENT COURT
AT CHRISTCHURCH

ENV-2019-CHC-000062

I MUA I TE KOOTI TAIAO
I ŌTAUTAHI ROHE

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

AND

IN THE MATTER of an appeal under clause 14(1) of the
First Schedule of the Act in relation to
stage 2 of the proposed Queenstown
Lakes District Plan

BETWEEN **Well Smart Investments Group**
Appellant

AND **Queenstown Lakes District Council**
Respondent

NOTICE OF WISH OF RCL QUEENSTOWN PTY LTD, RCL HENLEY
DOWNS LTD, AND RCL JACKS POINT LTD TO BE PARTY TO
PROCEEDING UNDER S.274 OF THE ACT

 **ATKINS | HOLM | MAJUREY**

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TO: The Registrar
Environment Court
CHRISTCHURCH

1. RCL Queenstown Pty Ltd, RCL Henley Downs Ltd, and RCL Jacks Point Ltd (together **RCL**) wish to be party to this proceeding (ENV-2019-CHC-000062), an appeal by Well Smart Investments Group (**Well Smart**) on Stage 2 of the proposed Queenstown Lakes District Plan (**PDP**).

NATURE OF INTEREST

2. RCL made a submission on Stage 2 of the PDP on 23 February 2018 and lodged its own appeal on Chapter 29 – Transportation of the PDP on 6 May 2019 (ENV-2019-CHC-000022).
3. RCL has an interest in the proceedings that is greater than the interest that the general public has because it has significant landholdings within the Jacks Point Zone including an approximately 1750 lot staged subdivision which is currently under construction (refer **Annexure A**) and which will be directly affected by aspects of the appeal.
4. RCL is not a trade competitor for the purposes of section 308C of the Act.

EXTENT OF INTEREST

5. RCL is interested in part of the appeal.
6. RCL is particularly interested in parts of the appeal relating to Chapter 29 – Transportation:
 - (a) Policy 29.2.4.4; and

- (b) Rule 29.4.11 – High Traffic Generating Activity (**HTGA**).¹

RELIEF SOUGHT


7. RCL supports the relief sought, (the replacement of the Policy and the deletion of the Rule) to the extent it is consistent with its own appeal (ENV-2019-CHC-000022), because:
- (a) the HTGA Rule is not necessary as the transport effects of new subdivisions and land uses are addressed elsewhere (such as Chapter 27 and specific locality chapters like Chapter 41 – Jacks Point);
 - (b) the HTGA Rule is inefficient as it requires developers to go through a further consent procedure when traffic impacts have already been considered at the time of zoning/structure planning the land and/or at the time subdivision/land use consent(s) are issued;
 - (c) for the reasons otherwise set out in the Well Smart appeal and RCL's own appeal; and
 - (d) as granting of the relief sought would promote the sustainable management of resources and best achieve the purpose of the Act.

MEDIATION

8. RCL agrees to participate in mediation or other alternative dispute resolution.

¹ This was Rule 29.4.10 in the notified version of the Proposed Plan and referenced as such in the Well Smart Submission.

DATE: 15 May 2019



Mike Holm / Vicki Morrison-Shaw

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Ltd, RCL Henley Downs Ltd, and RCL
Jacks Point Ltd

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ANNEXURE A – RCL LANDHOLDINGS