IN THE ENVIRONMENT COURT
CHRISTCHURCH REGISTRY

I MUA I TE KŌTI TAIAO O AOTEAROA

IN THE MATTER	of the Resource Management Act 1991
AND	
IN THE MATTER	of an appeal under Clause 14 of Schedule 1 of the Act
BETWEEN	**WILLOWRIDGE DEVELOPMENTS LIMITED**
	Appellant
AND	**QUEENSTOWN LAKES DISTRICT COUNCIL**
	Respondent

NOTICE OF APPEAL

Dated: 3 May 2019

Solicitors:

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LAWYERS | NOTARY PUBLIC

To: The Registrar
Environment Court
Christchurch

1. Willowridge Developments Limited ("**Appellant**") appeals against a decision of the Queenstown Lakes District Council ("**Council**") on its Proposed District Plan ("**Plan**").

2. The Appellant made a submission on the Plan.

3. The Appellant is not a trade competitor for the purpose of section 308D of the Resource Management Act 1991.

4. The Appellant received notice of the decision on 7 March 2019.

5. The decision the Appellant is appealing is:

   a. The rejection of the Appellant's submission seeking the deletion of Rule 29.4.10, which requires High Traffic Generating Activities under Table 29.10 to require a resource consent, or the amendment of the rule to only apply to parts of the district where there is a clear need to reduce the number of private vehicles.

   b. The rejection of the Appellant's submission seeking the deletion or amendment of the High Generating Traffic Activities thresholds in Table 29.10.

6. The reasons for the appeal are as follows:

   a. The Council failed to appropriately acknowledge that to require activities that exceed the thresholds in Table 29.10 to obtain consent will be an inefficient use of resources and will lead to unnecessary consent applications.

   b. The Council in applying the rule on a district wide basis failed to consider that such is unsuitable and inefficient given the differences within the district in terms of transport demands and constraints.

   c. The Council did not appropriately consider that traffic effects should be taken into account at the time land is zoned, and if the activity is anticipated by the zoning it should not trigger the rule.

   d. The Council erred in its determination that traffic effects could not be adequately assessed during the subdivision process and that a further consent would be required to assess such effects.

   e. The Council erred in applying the thresholds for High Generating Activities as they are too low and will result a number of applications that are just within each threshold.

   f. The decisions are contrary to Part 2 of the Resource Management Act 1991.

7. The Appellant seeks the following relief:

   a. That the decision of the Council be overturned, and the Appellant's appeal be accepted.

8. The following documents are attached to this notice:

     a. A copy of the Appellant's submission;

     b. A copy of the decision; and

     c. A list of names and addresses to be served with a copy of this notice.

Dated: 3 May 2019

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Signed for the Appellant
by their solicitor and duly authorised agent
Graeme Morris Todd/Benjamin Brett Gresson

Address for service of the Appellant:

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Advice to recipients of copy of notice of appeal

How to become party to proceedings

You may be a party to the appeal if you lodge a notice of your wish to be a party to the proceedings (in form 33) with the Environment Court, and serve copies on the other parties, within 15 working days after the period for lodging a notice of appeal ends.

Your right to be a party to the proceedings in the Court may be limited by the trade competition provisions in section 274(1) and Part 11A of the Resource Management Act 1991.

You may apply to the Environment Court under section 281 of the Resource Management Act 1991 for a waiver of the above timing requirements (see form 38).

Advice

If you have any questions about this notice, contact the Environment Court in Auckland, Wellington, or Christchurch.