

**BEFORE THE ENVIRONMENT COURT
AT CHRISTCHURCH**

**I TE KŌTI TAIAO O AOTEAROA
ŌTAUTAHI ROHE**

ENV-2024-CHC-049

IN THE MATTER OF

the Resource Management Act 1991

AND

IN THE MATTER OF

an appeal pursuant to clause 14 of
schedule 1 of the Act, concerning the
Central Otago District Plan – Plan
Change 19

BETWEEN

GRAEME CROSBIE

Appellant

AND

CENTRAL OTAGO DISTRICT COUNCIL

Respondent

**NOTICE BY ROWAN AND JOHN KLEVSTUL
OF WISH TO BE PARTY TO APPEAL**

Dated: 30 August 2024

TO: The Registrar
Environment Court
Christchurch

AND TO: The Appellant

AND TO: The Respondent

1. Rowan and John Klevstul (referred to as “**we**”, and “**our**” as appropriate) wish to be a party to the following proceedings:

ENV-2024-CHC-49 *Graeme Crosbie v Central Otago District Council*, an appeal pursuant to Schedule 1, clause 14(1) of the Act

(Crosbie Appeal)

2. The Appeal relates to a Central Otago District Council decision on a Plan Change to the residential provisions of the Central Otago District Plan – Plan Change 19 (**PC19**).
3. We made a submission on PC19 and have lodged our own appeal (ENV-2024-CHC-071) that raises several similar matters to some of those that are raised in the Crosbie Appeal. We also have an interest in the proceeding greater than the interest that the general public has, as the outcome of our appeal has the potential to be directly affected by the same matters that are raised in the Crosbie Appeal.
4. We do not consider ourselves to be a trade competitor for the purposes of section 308C or 308CA of the RMA. We are not developers, although we do wish to have our land at 2 Schoolhouse Road in Bannockburn zoned Large Lot Residential Zone LLRZ (**LLRZ**) (and the Crosbie Appeal seeks rezoning of the Domain Road Vineyard at 46 Domain Road in Bannockburn to LLRZ). We do not see it as once site or the other. There is sufficient demand or need for housing at Bannockburn for both rezonings to proceed. Each will stand or fall on their own merits.
5. We are neutral on whether the Domain Road Vineyard should be LLRZ as we do not know enough about its particular circumstances and all the issues that need to be considered, however, we are interested in those parts of the appeal that raise the following matters (of general application, or application also to 2 Schoolhouse Road):
 - a. [Whether a site is]... a logical extension of Bannockburn.

- b. There is demand for housing capacity within Bannockburn, and the Decision defers addressing this to some unknown point in the future.
 - c. The Decision fails to appropriately weigh the benefits of rezoning ...
 - d. Rezoning ... would align with LLRZ objectives and policies as it would be well-connected to the Bannockburn area.
 - e. The Decision errs in finding it necessary to undertake further review of zoning for Bannockburn generally, deferring a decision on appropriate zoning of the Site through Plan Change 19.
 - f. Strict adherence to the Cromwell Spatial Plan extent is flawed, particularly given the higher than expected growth in demand for housing capacity since the Cromwell Spatial Plan was developed. Zoning decisions should be responsive to new information regarding housing demands.
 - g. Rezoning ... is appropriate and is an efficient and effective method to the achieve the objectives of PC19.
 - h. Rezoning ... to LLRZ would be consistent with the Council's function and the purpose of the Resource Management Act 1991.
6. We are interested in all of the issues arising out of the above. We raised similar issues in our appeal (ENV-2024-CHC-071).
7. We generally support the matters raised in the Crosbie Appeal as identified above, particularly to the extent that they are consistent with the matters raised and relief sought in our submission and our own appeal (ENV-2024-CHC-71), and for the reasons given in those documents.
8. We agree to participate in mediation or other alternative dispute resolution of the proceedings.

DATED this 30 August 2024



Signed by ROWAN KLEVSTUL on behalf of ROWAN AND JOHN KLEVSTUL

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