

**IN THE ENVIRONMENT COURT  
CHRISTCHURCH REGISTRY**

**I MUA I TE KŌTI TAIAO O AOTEAROA**

<b>IN THE MATTER</b>	of the Resource Management Act 1991
<b>AND</b>	
<b>IN THE MATTER</b>	of an appeal under Clause 14 of Schedule 1 of the Act
<b>BETWEEN</b>	<b>GLEN DENE LIMITED AND SARAH BURDON</b>
	Appellant
<b>AND</b>	<b>QUEENSTOWN LAKES DISTRICT COUNCIL</b>
	Respondent

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**NOTICE OF APPEAL**

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**Dated: 7 May 2019**

Solicitors:

G M Todd/B B Gresson  
PO Box 124  
Queenstown 9348  
P 03 441 2743  
F 03 441 2976  
graeme@toddandwalker.com;  
ben@toddandwalker.com

**To:** The Registrar  
Environment Court  
Christchurch

1. Glen Dene Limited and Sarah Burdon (“**Appellants**”) appeal 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 21 March 2019.
5. The decision the Appellant is appealing is:
  - a. The rejection of the Appellant’s submission seeking its land at Lake Hawea Campground as identified in the submission be rezoned as Community Purpose – Campground Subzone.
  - b. The provisions of the Open Space and Recreation Zone Chapter.
6. The reasons for the appeal are as follows:
  - a. The Hearings Panel in recommending rejection of the Appellant’s submission to the Council was wrong to determine that the Appellant did not have scope to seek its land be rezoned Community Purpose – Campground Subzone.
  - b. The Panel erred in determining that the Appellant had scope only to seek a Visitor Accommodation Sub-Zone over its land.
  - c. Based on this incorrect determination, the Panel did not consider the evidence on behalf of the Appellant that demonstrated the appropriateness of the Community Purpose – Campground Subzone.
  - d. There was no evidence on behalf of the Council that suggested such zoning was not appropriate as the evidence of the Council assessed the submission only in the context of a Visitor Accommodation Sub-Zone.
7. The Appellant seeks the following relief:
  - a. That the decision of the Council be overturned, and the Appellant’s appeal accepted with respect to the zoning of the land identified in the submission as Community Purpose – Campground Subzone; and
  - b. Amendments to the Open Space and Recreation Chapter so as to include non-Council owned land within the Purpose of the Community Purpose – Campground Subzone.
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: 7 May 2019



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Signed for Glen Dene Limited and Sarah Burdon  
by their solicitor and duly authorised agent  
Graeme Morris Todd/Benjamin Brett Gresson

**Address for service of the Appellant:**

Todd & Walker Law  
PO Box 124  
Queenstown 9348  
Telephone: 03 441 2743  
Facsimile: 03 441 2976  
Email: [graeme@toddandwalker.com](mailto:graeme@toddandwalker.com); [ben@toddandwalker.com](mailto:ben@toddandwalker.com)

**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.