

**BEFORE THE ENVIRONMENT COURT
IN CHRISTCHURCH**

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

BETWEEN

JAMES WILSON COOPER

Appellant

AND

**QUEENSTOWN LAKES
DISTRICT COUNCIL**

Respondent

NOTICE OF APPEAL

Dated: 19 June 2018

TODD & WALKER law
LAWYERS | NOTARY PUBLIC

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. James Wilson Cooper ("**the Appellant**") appeals against a decision of the Queenstown Lakes District Council ("**Council**") on the Queenstown Lakes Proposed District Plan ("**Plan**").
2. The Appellant made a submission on the Plan.
3. The Appellant is not a trade competitor for the purposes of section 308D of the Resource Management Act 1991.
4. The Appellant received notice of the decision on 4 May 2018.
5. The decision the Appellant is appealing is:
 - a. The rejection of the Appellant's submission seeking the removal of the Outstanding Natural Landscape ("**ONL**") line from the Appellant's land.
6. The reasons for the appeal are as follows:
 - a. The Council in reaching its decision relied on incorrect and unsound evidence.
 - b. The land in question is not part of an ONL and does not have the characteristics of an ONL.
 - c. The decision is not in accordance with sound resource management planning principles.
7. The Appellant seeks the following relief:
 - a. That the decision of the Council be overturned, and the Appellant's submission 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 this 19th day of June 2018



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

Address for Service for the Appellant:

Todd and Walker Law
PO Box 124
Queenstown 9348
Phone: 03 441 2743
Facsimile 03 441 2976
Email: graeme@toddandwalker.com; ben@toddandwalker.com