

**BEFORE THE ENVIRONMENT COURT OF NEW ZEALAND  
CHRISTCHURCH REGISTRY**

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

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

**AND**

**IN THE MATTER** of an appeal under clause 14(1) of the  
First Schedule of the RMA

**BETWEEN** **KEN MUIR**

Appellant

(ENV-2021-CHC027)

**AND**

**QUEENSTOWN LAKES DISTRICT  
COUNCIL**

Respondent

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**NOTICE OF QUEENSTOWN PARK LIMITED'S AND REMARKABLES  
PARK LIMITED'S WISH TO BE PARTY TO PROCEEDINGS UNDER  
SECTION 274 OF THE RESOURCE MANAGEMENT ACT 1991**

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**BROOKFIELDS  
LAWYERS**

J D Young / R H Ashton  
Telephone No. 09 979 2248  
Fax No. 09 379 3224  
P O Box 240  
DX CP24134  
**AUCKLAND**

**TO:** The Registrar  
Environment Court  
Christchurch

**AND TO:** Ken Muir  
C/- James Gardner-Hopkins, Barrister  
PO Box 25-160,  
Wellington 6011.

**AND TO:** The Respondent

1. Queenstown Park Limited and Remarkables Park Limited (together the **the Parties**) wish to be parties to the following proceeding concerning an appeal against the decisions of the Queenstown Lakes District Council (**Council**) in respect of Stage 3 of the Proposed Queenstown Lakes District Plan (**Proposed Plan**):

(a) ENV-2021-CHC-027 v Ken Muir (**Appeal**).

**Nature of Interest**

2. The Parties made submissions and further submissions on the subject matter of the proceedings. The Parties have interests in the proceedings that are greater than the interest that the general public because they have significant landholdings which may be directly affected by the Appeal.

**No prohibited trade competition purposes**

3. The Parties are not a trade competitor for the purposes of section 308C of the Resource Management Act 1991 (**RMA**).

**Extent of Interest**

4. The Parties are interested in all of the proceedings that relate to Topic 34: Wāhi Tūpuna.

### **Relief Sought**

5. The Parties **support** the relief sought in the Appeal, except to the extent that it is inconsistent with the Parties' own appeal (including subject to any amendments or withdrawals), because:
  - (a) It promotes sustainable management;
  - (b) It enables social, economic and cultural wellbeing;
  - (c) It is otherwise consistent with Part 2 of the RMA, in particular, the efficient use and development of the land (a matter to have particular regard to under section 7(b) of the Act);
  - (d) It is appropriate in terms of section 32 of the RMA;
  - (e) It achieves the functions of the Council under section 31 of integrated management of the effects of the use and development of land and physical resources;
  - (f) It is procedurally fair and efficient; and
  - (g) Otherwise for the reasons set out in the Parties submissions and further submissions on the Proposed Plan.
  
6. The Parties seek that the relief sought in the Appeal be granted.

### **Mediation**

7. The Parties agree to participate in mediation or other dispute resolution of the proceedings.

### **Service**

8. A copy of this notice has been served on the Respondent and Appellant electronically by email.

**DATED** the 16<sup>th</sup> day of June 2021

**QUEENSTOWN PARK LIMITED**  
and **REMARKABLES PARK**  
**LIMITED** by their lawyers and duly  
authorised agents **BROOKFIELDS**  
**LAWYERS**



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J D Young / R H Ashton  
Counsel for the Parties

This section 274 notice is filed by **John Dylan Young**, solicitor for Queenstown Park Limited and Remarkables Park Limited. The address for service of Queenstown Park Limited and Remarkables Park Limited is at the offices of Brookfields Lawyers, Tower 1, 9<sup>th</sup> Floor, 205 Queen Street, Auckland.

Documents for service on Queenstown Park Limited and Remarkables Park Limited may be left at the address for service or may be:

1. Posted to the solicitors at PO Box 240, Auckland 1140.
2. Left for the solicitors at Document Exchange for direction to DX CP24134.
3. Transmitted to the solicitors by facimile to 09 379 3224.
4. Emailed to the solicitors at [youngj@brookfields.co.nz](mailto:youngj@brookfields.co.nz) or [ashton@brookfields.co.nz](mailto:ashton@brookfields.co.nz)