

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

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

**ENV-2019-CHC-000090**

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

**AND**

**IN THE MATTER** of an appeal pursuant to Clause 14(1) of  
Schedule 1 of the Act in relation to the proposed  
Queenstown Lakes District Plan

**BETWEEN** **WATERFALL PARK DEVELOPMENTS LIMITED**

Appellant

**AND** **QUEENSTOWN LAKES DISTRICT COUNCIL**

Respondent

---

**NOTICE OF MILLBROOK COUNTRY CLUB LIMITED'S WISH TO BE A PARTY  
TO PROCEEDINGS PURSUANT TO SECTION 274 OF THE ACT**

Dated: 31 May 2019

---

---

**Counsel acting:**

Ian Gordon  
Barrister  
Stout Street Chambers  
Level 6, 1 Post Office Square  
Wellington  
Ph: 04-472 9026  
Email: [ian.gordon@stoutstreet.co.nz](mailto:ian.gordon@stoutstreet.co.nz)

TO: The Registrar  
Environment Court  
CHRISTCHURCH

1. Millbrook Country Club Limited (Millbrook) wishes to be a party pursuant to s 274 of the Act to the following proceedings:

*WATERFALL PARK DEVELOPMENTS LIMITED v QLDC (ENV-2019-CHC-000084)* being an appeal against a decision of Queenstown Lakes District Council on the proposed Queenstown Lakes District Plan (**PDP**).

2. Millbrook is interested in all aspects of this appeal and the relief sought by it. It was a submitter and further submitter on Planning Map 26 and Chapter 24, and a further submitter on submission #2388 and #2773 by the Appellant.
3. Millbrook has an interest greater than the public generally because of the necessity to develop the Millbrook Resort Zone (**MRZ**) in an integrated and efficient manner and the potential for adverse effects of inappropriate or sub-optimal zoning of adjoining land.
4. Millbrook is not a trade competitor for the purposes of s 308C or 308CA of the Act.
5. Without derogating from the generality of the above, Millbrook is interested in the following particular issues:
  - (a) Optimal zoning for the Appellant's Ayrburn land including site specific suitability for limited development under a discretionary, design-led regime below a specific elevation of 380masl and Open Space zoning above that elevation;
  - (b) The relief identified, opposed and/or proposed by Millbrook in its further submission FS2773 including the:
    - A. *Primary Relief: Rezone Site A to Ayrburn Zone and Site B to Waterfall Park Zone (refer proposed Structure Plan – p.16 of #2388), and rezone the land east of Waterfall Park Zone to WBLP, adjust the LCU and extend the UGB;*
    - B. *First Alternative Relief: Rezone Site A and Site B Waterfall Park Zone, adjust the LCU and extend the UGB;*
    - C. *Secondary Relief: Retain and extend the WBLP zoning over most of Site A, and rezone Site B and part of Site A to Waterfall Park Zone and adjust the LCU;*

- D. *Third Relief: Retain the RR Zone and extend it over Site A and rezone Site B Waterfall Park Zone and adjust the LCU, and*
- (c) The specific components of each of those alternatives regimes of relief as identified by Millbrook in its further submission FS2773 if advanced by the Appellant in this appeal; and
  - (d) The proposed inclusion of the MRZ and WPZ within an Urban Growth Boundary.
6. Any further, more refined, consequential, additional, other or alternative relief that might be deemed to give effect to this appeal and/or better serve the overall objectives of the district plan and the purpose and principles of the Resource Management Act 1991.
7. Millbrook agrees to participate in mediation or other alternative dispute resolution.

DATED 31 May 2019



---

IM Gordon

Counsel for the section 274 party

**Address for service of person wishing to be a party**

Ian Gordon  
Stout Street Chambers  
Level 6, Huddart Parker Building  
PO Box 117  
Wellington 6140

Phone: 04 472 9026  
Email: [ian.gordon@stoutstreet.co.nz](mailto:ian.gordon@stoutstreet.co.nz)

**Advice:**

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