

**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**

**GLEN DENE LIMITED, GLEN  
DENE HOLDINGS LIMITED  
AND SARAH BURDON**

Appellant

**AND**

**QUEENSTOWN LAKES  
DISTRICT COUNCIL**

Respondent

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**NOTICE OF APPEAL**

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**Dated: 19 June 2018**

Solicitors:

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**To:** The Registrar  
Environment Court  
Christchurch

1. Glen Dene Limited, Glen Dene Holdings Limited and Sarah Burdon (**"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 to rezone its property at Lake Hawea campground, being Lot 1 and 2 Deposited Plan 418972, and Part Section 2 Block II Lower Hawea Survey District, as Rural Visitor Zone – Hawea Campground (**"RVZ-HC"**)
6. The reasons for the appeal are as follows:
  - a. The Council was wrong to find that it was not within its jurisdiction to rezone the land RVZ-HC.
  - b. Given how the camping ground has been developed and how the land sought to be rezoned is regularly used, the proposed Rural zoning is not appropriate and the RVZ-HC sought in the submission is appropriate.
  - c. The proposed RVZ-HC would be more efficient.
  - d. The notification of Stage 2 of the Plan and the proposal to rezone part of the camp ground as Open Space and Recreation Zone does not affect the scope of the Appellant's submission or the ability for the relief sought to be granted. The Council erred in law in finding such.
  - e. The proposed zoning is in accordance and consistent with the Strategic Direction provisions in the Plan.
  - f. The proposed zoning would be in accordance with the Objectives and Policies of the Plan.
  - g. The subject site is suitable for rezoning as the evidence before the Council was the land has a high capacity to absorb development without adverse visual effects.

- h. The proposed zoning and subsequent development enabled by such zoning would not adversely impact on the Outstanding Natural Landscape or the visual amenity values of the site.
  - i. The adjoining State Highway has the capacity to cater for both existing development and development that would be enabled through the rezoning of the land.
  - j. The Council erred in finding that the land had "special qualities".
  - k. There was no justification or evidential basis for the Council to find the rezoning could result in the campground being established.
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 19<sup>th</sup> day of June 2018



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