

**BEFORE THE ENVIRONMENT COURT
CHRISTCHURCH REGISTRY**

ENV-2018-CHC-069

IN THE MATTER An appeal pursuant to clause 14 of
the first schedule to the Resource
Management Act 1991

AND

IN THE MATTER of the Queenstown Lakes District
Proposed District Plan

Between

MICHAEL BERESFORD

Appellant

**QUEENSTOWN LAKES DISTRICT
COUNCIL**

Respondent

SECTION 274 NOTICE BY KIRIMOKO NO 2 LIMITED PARTNERSHIP

**GALLAWAY COOK ALLAN
LAWYERS
DUNEDIN**

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To The Registrar
Environment Court
Christchurch

1. Kirimoko No 2 Limited Partnership wishes to be a party of the following proceeding
 - (a) *Michael Beresford v Queenstown Lakes District Council* ENV-2018-CHC-069
2. I am a person that interested in the proceedings that is greater than the interest that the general public has. Kirimoko No 2 Limited Partnership is the owner of contiguous land, being Lot 6 DP 300734. The grounds are further set out in the affidavit of Johannes May filed herewith.
3. I am not a trade competitor for the purposes of section 308C and 308CA of the Resource Management Act 1991.
4. I am directly affected by the appeal. I am interested in the whole of the appeal which is the subject of this proceeding.
5. I oppose the relief sought because:
 - (a) The effects of development of land which is the subject of the appeal (Sticky Forest) cannot be reliably assessed because the property has no legal access and how access arrangements can be made are not certain.
 - (b) I am concerned that rezoning Sticky Forest for residential Development will create pressure for compulsory access to be provided through adjacent land (including Kirimoko No 2 Limited Partnership's land) that is currently not required.
 - (c) Kirimoko No 2 Limited Partnerships land, and other land surrounding Sticky Forest has been zoned for the purposes of the protecting the landscape and amenity values of Sticky Forest so making any provision for the development of Sticky Forest would make the zoning treatment of adjacent land incoherent.

- (d) Development of Sticky Forest would have inevitable adverse effects on the amenity values both of the land itself, but also enjoyed from Kirimoko No 2 Limited Partnerships land.
- (e) Development of Sticky Forest would adversely affect the amenities of users of the public access network around Stocky Forest, including as it passes through Kirimoko No 2 Limited Partnerships land.
- (f) And on further grounds set out in the affidavit of Johannes May filed herewith.

6. I agree to participate in mediation or alternative dispute resolution.



B Irving

Counsel for Kirimoko No 2 Limited Partnership

Date: 5 July 2018

cc. Prudence Steven QC pru@prusteven.co.nz

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