

**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**

Appellant

**AND**

**QUEENSTOWN LAKES  
DISTRICT COUNCIL**

Respondent

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**NOTICE OF APPEAL**

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**Dated: 19 June 2018**

**TODD & WALKER** **law**  
LAWYERS | NOTARY PUBLIC

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**To:** The Registrar  
Environment Court  
Christchurch

1. Glen Dene Limited ("**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 a rezoning of the Appellant's property at Glen Dene Station, Lake Hawea, to Rural Lifestyle Zone.
  - b. The identification of the Appellant's farmstead at Glen Station, Lake Hawea as part of an Outstanding Natural Landscape ("**ONL**").
6. The reasons for the appeal are as follows:
  - a. The decision is not in accordance with sound resource management principles.
  - b. The decision ignores the characteristics of and existing development on the land the subject of the submission.
  - c. To uphold the Appellant's submission and overturn the Council's decision would enable efficient use of the land and contribute to sustaining the balance of the Appellant's land as a viable and economic farming unit.
  - d. To enable the rezoning of the land as sought would not result in adverse effects on the environment and would recognise and provide for the protection of the ONL in the vicinity of the land.
  - e. The decision ignores the evidence presented in support of the submission.
  - f. The farmstead and immediately adjacent developed landscape is not part of the wider ONL and does not portray the characteristics of an ONL.
  - g. The rezoning is supported by the Strategic Direction and the relevant Objectives and Policies of the Plan.

- h. The proposed zoning will not adversely affect the rural character and ONL of the land or its immediate environs.
  - i. There are means by which the existing vegetation on site could be protected.
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

**Address for Service for the Appellant:**

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