

In the Environment Court of New Zealand
Christchurch Registry

I Te Koti Taiao o Aotearoa
Ōtautahi Rohe

ENV-2018-CHC-141

Under	the Resource Management Act 1991
In the matter of	an appeal under Clause 14(1) of Schedule 1 of the RMA in relation to the proposed Queenstown Lakes District Plan
Between	Glendhu Bay Trustees Limited
	Appellant
And	Queenstown Lakes District Council
	Respondent

Memorandum of Counsel to seek leave to file amended Notice of Appeal

13 March 2019

Appellant's solicitors:

Maree Baker-Galloway | Roisin Giles
Anderson Lloyd
Level 2, 13 Camp Street, Queenstown 9300
PO Box 201, Queenstown 9348
DX Box ZP95010 Queenstown
p + 64 3 450 0700 | f + 64 3 450 0799
maree.baker-galloway@al.nz | roisin.giles@al.nz

**anderson
lloyd.**

May it please the Court

- 1 This Memorandum of Counsel is filed on behalf of Glendhu Bay Trustees Limited (**Glendhu Bay**) in respect of its appeal on Stage 1 of the Queenstown Lakes Proposed District Plan.
- 2 Following on from the Mediation Agreement for the Topic 7 (Subdivision) mediation dated 28 February 2019 (attached as **Appendix A**), Counsel seeks leave to file an amended Notice of Appeal for Glendhu Bay.
- 3 The purpose of the amended Notice of Appeal is to clarify that the relief sought to Chapter 27 (Subdivision) by Glendhu Bay in its Notice of Appeal is sought only in relation to its land (that land being identified in its Notice of Appeal).
- 4 An amended Notice of Appeal is lodged with this Memorandum of Counsel, showing a track change version as **Appendix B** and a clean version as **Appendix C**.

Dated this 13th day of March 2019



Maree Baker-Galloway/Roisin Giles
Counsel for the Appellant