

In the Environment Court of New Zealand
Christchurch Registry

I Mua I Te Kōti Taiao o Aotearoa
Ōtautahi Rohe

ENV-2019-CHC-066

Under the Resource Management Act 1991 (the **Act**)

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 **The Crown Investment Trust**

Appellant

And **Queenstown Lakes District Council**

Respondent

Memorandum of Counsel

11 November 2020

Section 274 party's solicitors:

Maree Baker-Galloway | Sam Chidgey
Anderson Lloyd
Level 2, 13 Camp Street, Queenstown 9300
PO Box 201, Queenstown 9348
DX Box ZP95010 Queenstown
p + 64 3 450 0700
maree.baker-galloway@al.nz | sam.chidgey@al.nz

**anderson
lloyd.**

May it please the Court

- 1 This Memorandum of Counsel is filed on behalf of the following parties who joined *The Crown Investment Trust v Queenstown Lakes District Council* (**ENV-2019-CHC-066**) Appeal (**CIT Appeal**) as section 274 parties under Stage 2 – Proposed Queenstown Lakes District Plan (**Proposed Plan**):
 - (a) Felzar Properties Limited, Morven Ferry Limited, Strain, Antony, Sarah & Samuel, Wakatipu Equities Limited and Skipp Williamson (the **Parties**).
- 2 The Parties are listed as having an interest in the site specific re-zoning sought in CIT's Appeal to be mediated on at the upcoming Topic 31: Rezoning (**Topic 31**) mediation.
- 3 The Parties respectfully advise the Court they do not have an interest in the CIT Appeal to the extent that it seeks site specific re-zonings allocated to Topic 31 and therefore, seek leave to be excused from the upcoming mediation.

Dated this 11th day of November 2020

Maree Baker-Galloway

Maree Baker-Galloway/Sam Chidgey
Counsel for the Section 274 party