

In the Environment Court of New Zealand
Christchurch Registry

I Te Koti Taiao o Aotearoa
Ōtautahi Rohe

ENV-2019-CHC-076

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 Stage 2 of the proposed Queenstown Lakes District Plan
Between	Wayfare Group Limited
	Appellant
And	Queenstown Lakes District Council
	Respondent

**Memorandum of Counsel withdrawing appeal points and interest in Topic 29:
Visitor Accommodation Variation mediation**

28 August 2020

Appellant's solicitors:
Maree Baker-Galloway
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/sam.chidgey@al.nz

**anderson
lloyd.**

May it please the Court

- 1 This Memorandum of Counsel is filed on behalf of Wayfare Group Limited (**Appellant**) in relation to its appeal on Stage 2 of the Queenstown Lakes Proposed District Plan (**Proposed Plan**).
- 2 Counsel respectfully advises the Court that the Appellant wishes to withdraw its relief contained at pages 39-49, Appendix 1 of its Notice of Appeal (**ENV-2019-CHC-076**), in relation to Topic 29: Visitor Accommodation Variation.
- 3 Upon withdrawing its relief in respect of the appeal points allocated to Topic 29, the Appellant no longer has an interest (including section 274 interest) in the upcoming Topic 29 mediation, and respectfully seeks leave to be excused.
- 4 Counsel advises the Appellant has conferred with the Council who has confirmed it has no issue as to costs.
- 5 An amended Notice of Appeal is lodged with this memorandum, showing a track change version as "Appendix A" and a clean version as "Appendix B".

Dated this 28th day of August 2020

Maree Baker-Galloway

Maree Baker-Galloway

Counsel for the Appellant