

**In the Environment Court of New Zealand
Christchurch Registry**

**I Te Kooti Taiao O Aotearoa
Ōtautahi Rohe**

ENV-2019-CHC-062

Under the Resource Management Act 1991 (the Act)

In the matter of an appeal pursuant to clause 14 of the First Schedule of the Act

Between **Well Smart Investments Group**
Appellant

And **Queenstown Lakes District Council**
Respondent

And **Transpower New Zealand Limited**
Section 274 party

**Memorandum of counsel for Transpower New Zealand Limited
withdrawing part of section 274 interest**

Dated 22 April 2020

大成 DENTONS KENSINGTON SWAN

89 The Terrace
PO Box 10246
Wellington 6143

P +64 4 472 7877
F +64 4 472 2291
DX SP26517

Solicitor: N McIndoe
E nicky.mcindoe@dentons.com

MAY IT PLEASE THE COURT

1. Transpower New Zealand Limited (**'Transpower'**) is a section 274 party to the appeal by Well Smart Investments Group (ENV-2019-CHC-062) against Stage 2 decisions on the Proposed Queenstown Lakes District Plan (**'Proposed Plan'**).
2. After lodging its appeal, Well Smart Investments Group provided further particulars of the amendments it seeks the earthworks chapter of the Proposed Plan, being amendments to Objective 25.2.1 and Policy 25.2.1.2, and a new Policy which it seeks regarding earthworks.
3. On the basis of these further particulars, Transpower wishes to withdraw its interest in those parts of the Well Smart Investments Group appeal which seeks amendments to the Objectives and Policies in the Earthworks Chapter (Chapter 25).
4. For the avoidance of doubt, Transpower retains its interests in other parts of the Well Smart Investments Group appeal, including its interests in relief relating to the following Chapter 25 provisions:
 - a. Rule 25.6;
 - b. Rule 25.8.

Dated 22 April 2020



Nicola McIndoe

Counsel for Transpower New Zealand Limited