In the Environment Court of New Zealand
Christchurch Registry

I Te Koti Taiao o Aotearoa
Ōtautahi Rohe

ENV-2018-CHC-137

Under	the Resource Management Act 1991
In the matter of	an appeal under Clause 14(1) of Schedule1 of the Resource Management Act 1991
Between	**Coneburn Preserve Holdings Limited & Others**
	Appellant
And	**Queenstown Lakes District Council**
	Respondent

Memorandum of Counsel amending parts of Notice of Appeal

4 March 2019

Appellant's solicitor:
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May it please the Court

1   This Memorandum of Counsel is filed on behalf of Coneburn Preserve Holdings Limited & Others (**Jacks Point**) in respect of its appeal on Stage 1 of the Queenstown Lakes Proposed District Plan (**PDP**) (ENV-2018-CHC-137).

2   Jacks Point wishes to amend its Notice of Appeal by withdrawing in its entirety the final appeal point included in Appendix 1 of its Notice of Appeal, which reads as follows:

> *Delete the Coneburn Industrial Zone identified in planning map 13 and Chapter 44 of the PDP; or*

> *Amend Chapter 44 subject to further refinements to the objectives, policies and rules which ensure that adverse effects on amenity, visual character, landscape, transport, noise, and traffic on the JPZ are adequately addressed.*

3   An amended Notice of Appeal is lodged with this Memorandum, showing a tracked change version as "Appendix A" and a clean version as "Appendix B".

4   As Jacks Point was the only appellant seeking relief to Chapter 44 (Coneburn Industrial Zone) of the PDP, it is Jacks Point's understanding that its withdrawal of the appeal point set out above resolves all matters allocated to Topic 9 (Coneburn Industrial Zone) of Stage 1 of the DPR.

Dated this 4th day of March 2019

Maree Baker-Galloway

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Maree Baker-Galloway
Counsel for the Appellant