

In the Environment Court of New Zealand
Christchurch Registry

I Te Koti Taiao o Aotearoa
Ōtautahi Rohe

ENV-2018-CHC-000119

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

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 **Halfway Bay Lands Limited**
Appellant

And **Queenstown Lakes District Council**
Respondent

Memorandum on behalf of Halfway Bay Lands Limited Withdrawing Appeal Point

31 October 2018

Contact details for the appellant:

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May it please the Court

1. This memorandum is filed on behalf of Halfway Bay Lands Limited relating to an appeal point made by Halfway Bay Lands Limited on Stage 1 of the Queenstown Lakes Proposed District Plan ('PDP') review.
2. On 5th of October 2018 we received correspondence from Queenstown Lakes District Council (QLDC) raising jurisdictional issues with the appeal filed by Halfway Bay Lands Limited (ENV-2018-CHC-119). Specifically, Halfway Bay Lands Limited sought relief to amend the Strategic Direction Objectives and Policies in Chapters 3 and 6 to facilitate the introduction of the Operative Rural Visitor Zone into the PDP.
3. On behalf of Halfway Bay Lands Limited we confirm this appeal point is withdrawn.
4. This withdrawal is based on the understanding¹ that the appellant will be able to seek amendments to the Strategic Direction provisions as part of Stage 3 of the District Plan Review (Rural Visitor Zones).

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Dated this 31 Day of October 2018



James Aoake
Contact for Halfway Bay Lands Limited

¹ Based on feedback from Counsel for the Respondent (which is similar to that for the Stage 2 matters as outlined Council's Opening Legal Submissions for Queenstown Lakes District Council, Hearing Stream 14 – Wakatipu Basin, 5 July 2018 (Paragraph 2.5): "The Council's recommendation is to add new provisions to Chapter 6 of the PDP that apply to the Wakatipu Basin Rural Amenity Zone (only). This has required careful consideration given the form of the decisions version of Chapter 6, where Policy 6.3.3 is that a separate regulatory regime is to be provided for a number of zones which are not zoned "Rural Zone" on the plan maps, and therefore cannot be one of the three Rural Zoned landscapes specified in Policy 6.3.1 - ONF, ONL or Rural Character Landscape (but are still a section 7(c) landscape). Policy 6.3.3 also is that the ONF/ONL/Rural Character Landscape categories and policies of the chapter related to each of those categories do not apply, unless otherwise stated."