

In the Environment Court of New Zealand
Christchurch Registry

I Te Koti Taiao o Aotearoa
Ōtautahi Rohe

ENV-2018-CHC-132

Under the Resource Management Act 1991

In the matter of an appeal under Clause 14 of Schedule 1 of the Act against decisions of the Queenstown Lakes District Council on Stage 1 of the Proposed District Plan

Between **Aircraft Owners and Pilots Association (NZ) Inc** (ENV-2018-CHC-132)

Appellant

And **Queenstown Lakes District Council**

Respondent

Memorandum of counsel to withdraw appeal points

2 November 2018

Appellant's solicitors:

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**anderson
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May it please the Court

- 1 This Memorandum of Counsel is filed on behalf of Aircraft Owners and Pilots Association (NZ) Inc in respect of its appeal on Stage 1 of the Queenstown Lakes Proposed District Plan (ENV-2018-CHC-132).
- 2 In response to jurisdictional issues raised by Counsel for the Queenstown Lakes District Council, Aircraft Owners and Pilots Association (NZ) Inc now amends its notice of appeal to remove appeal point 6 in relation to amendments sought to Chapter 24 Wakatipu Basin and associated planning maps.
- 3 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 2nd day of November 2018



Maree Baker-Galloway/Rosie Hill
Counsel for the Appellant

Appendix A – Track change version of Amended Notice of Appeal

Appendix B – Clean version of Amended Notice of Appeal