

In the Environment Court of New Zealand
Christchurch Registry

I Te Koti Taiao o Aotearoa
Ōtautahi Rohe

ENV-2019-CHC-086; 088

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 Stage 2 of the Queenstown Lakes Proposed District Plan
Between	Barnhill Corporate Trustee Limited and DE, ME Bunn and LA Green
And	Morven Ferry Limited
	Appellants
And	Queenstown Lakes District Council
	Respondent

Memorandum of Counsel regarding Notices of Appeal on Stage 2 of the Queenstown Lakes Proposed District Plan

20 May 2019

Appellants' solicitors:

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**anderson
lloyd.**

May it please the Court

- 1 This Memorandum of Counsel is filed on behalf of Barnhill Corporate Trustee Limited and DE, ME Bunn and LA Green (**Barnhill**), and Morven Ferry Limited (**Morven Ferry**).
- 2 Barnhill and Morven Ferry lodged appeals ENV-2019-CHC-086 (**Barnhill Appeal**) and ENV-2019-CHC-088 (**Morven Ferry Appeal**) respectively on Stage 2 of the Queenstown Lakes Proposed District Plan (**PDP**).
- 3 This Memorandum of Counsel is to clarify that the yellow highlighting used in Appendix A of the Barnhill Appeal and the Morven Ferry Appeal identifies relief sought to the provisions of Chapter 24 and Chapter 27 of the PDP that is sought to apply specifically to the 'Morven Ferry Subzone' proposed in the appeals.

Dated this 20th day of May 2019

Maree Baker-Galloway

Maree Baker-Galloway/Vanessa Robb
Counsel for the Appellants