

In the Environment Court of New Zealand  
Christchurch Registry

I Te Koti Taiao o Aotearoa  
Ōtautahi Rohe

**ENV--2018-CHC-086**

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Under	the Resource Management Act 1991
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	<b>Streat Developments Limited</b>
	Appellant
And	<b>Queenstown Lakes District Council</b>
	Respondent

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**Memorandum of Counsel requesting relief allocated to Stage 1 Topic 16 be placed on hold until notification of Stage 3 of the Proposed District Plan**

12 April 2019

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**Appellant's solicitors:**

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**anderson  
lloyd.**

**May it please the Court**

- 1 This Memorandum of Counsel is filed on behalf of Streat Developments Limited in respect of their appeal on Stage 1 of the Queenstown Lakes Proposed District Plan (**PDP**).
- 2 Following from the Mediation Agreement from Topic 16 (Group 1 Rezoning Appeals) dated 20 March 2019, Counsel seeks leave to request that the relief in the Streat Developments Limited Notice of Appeal dated 19 June 2018 at ENV-2018-CHC-086-001 and 002 relating to township zoning and extending the Urban Growth Boundary (**UGB**) at Hawea is put on hold until after notification of Stage 3 of the PDP. All parties agreed to this in the signing of the Mediation Agreement dated 20 March 2019.
- 3 The Township Zones are due to be notified as part of Stage 3 of the PDP in the third quarter of 2019. As part of the section 32 reporting process for the Township Zones, the Council officer will consider the most appropriate zoning and extent of the UGB at Hawea. The parties agreed to this in the signing of the Mediation Agreement dated 20 March 2019.
- 4 Streat Developments Limited agrees not to seek an Environment Court hearing on appeal points ENV-2018-CHC-086-001 and 002 until after notification of Stage 3 of the PDP.
- 5 Counsel has liaised with Counsel for Queenstown Lakes District Council who agrees to the filing of this memorandum.

Dated this 12<sup>th</sup> day of April 2019



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Maree Baker-Galloway  
Counsel for the Appellant