

**In the Environment Court  
Christchurch Registry**

I Mua I Te Kooti Taiao o Aotearoa

**ENV-2018-CHC-94**

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of appeals under Clause 14 of the First Schedule on decisions of the Queenstown Lakes District Council on Stage 1 of the Proposed Queenstown Lakes District Plan

**BETWEEN** **FII HOLDINGS LIMITED**

**AND** **other appellants on Topic 20, Subtopic 4 of Stage 1 of the Proposed Queenstown Lakes District Plan**

Appellant

**AND** **QUEENSTOWN LAKES DISTRICT COUNCIL**

Respondent

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**MEMORANDUM ON BEHALF OF S 274 PARTY ON TOPIC 20,  
SUBTOPIC 4 SUBDIVISION  
Dated 28 November 2019**

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**MACALISTER TODD PHILLIPS**

Barristers, Solicitors, Notaries

3<sup>rd</sup> Floor, 11-17 Church Street

Queenstown 9300

P O Box 653, DX ZP95001, Queenstown 9348

Telephone: (03) 441 0125 Fax: (03) 442 8116

Solicitor Acting: Jayne Macdonald

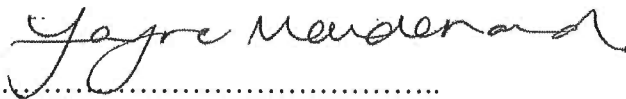
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**MEMORANDUM ON BEHALF OF S 274 PARTY ON TOPIC 7 SUBDIVISION AND  
DEVELOPMENT**

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**May it please the Court**

1. The Otago Foundation Trust Board and Wakatipu Community Presbyterian Church is a Section 274 party to the following appeals:
  - 1.1 ENV-2018-CHC-000084: FII Holdings Limited;
  - 1.2 ENV-2018-CHC-000101: Universal Developments Limited
2. The interest of this Section 274 party does not extend to specific matters related to default activity status for subdivision (Rule 27.5.8) covered in Topic 20, Subtopic 4. They do not therefore intend to participate in mediation on Topic 20, Subtopic 4, and accordingly withdraw all further interest in the topic.



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Jayne Elizabeth Macdonald  
Counsel for the s274 parties