

In the Environment Court of New Zealand
Christchurch Registry

I Te Koti Taiao o Aotearoa
Ōtautahi Rohe

ENV-2018-CHC-131
ENV-2018-CHC-138

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 Queenstown Lakes District Plan

Between **Real Journeys Limited**
Appellant

And **Real Journeys (trading as Go Orange Limited)**
Appellant

Memorandum of Counsel to seek leave to file amended notices of appeal

11 March 2019

Appellant's solicitors:

Maree Baker-Galloway | Hayley Mahon
Anderson Lloyd
Level 2, 13 Camp Street, Queenstown 9300
PO Box 201, Queenstown 9348
DX Box ZP95010 Queenstown
p + 64 3 450 0700 | f + 64 3 450 0799
maree.baker-galloway@al.nz | hayley.mahon@al.nz

**anderson
lloyd.**

And

Queenstown Lakes District Council

Respondent

May it please the Court

- 1 This Memorandum of Counsel is filed on behalf of Real Journeys Limited¹ and Real Journeys (trading as Go Orange Limited)² in respect of their appeals on Stage 1 of the Queenstown Lakes Proposed District Plan.
- 2 Following from the Mediation Agreement from Topic 2 Subtopic 9 (Managing Activities on Lakes and Rivers) dated 5 February 2019 (attached at **Appendix A**), Counsel seeks leave to file amended notices of appeal for Real Journeys Limited and Real Journeys (trading as Go Orange Limited).
- 3 Counsel notes that the mediation agreement at 5.2, only Real Journeys (trading as Go Orange Limited) was to seek to amend the appeal point ENV-2018-CHC-138-019, however, the Real Journeys appeal includes the identical appeal point at ENV-2018-CHC-131-039 and this should be amended too as both parties were present at the Topic 2 Subtopic 9 mediation.
- 4 Amended Notices of Appeal are lodged with this Memorandum of Counsel as follows:
 - (a) Real Journeys Limited Amended Appeal – track change version as **Appendix B**.
 - (b) Real Journeys Limited Amended Appeal – clean version as **Appendix C**.
 - (c) Real Journeys (trading as Go Orange Limited) Amended Appeal – track change version as **Appendix D**.
 - (d) Real Journeys (trading as Go Orange Limited) Amended Appeal – clean version as **Appendix E**.

Dated this 11th day of March 2019



Maree Baker-Galloway/Hayley Mahon
Counsel for the Appellant

¹ ENV-2018-CHC-131

² ENV-2018-CHC-138

