

**BEFORE THE ENVIRONMENT COURT
CHRISTCHURCH REGISTRY**

ENV-2018-CHC-053; 056,
057; 068; 078; 083; 091;
096; 104, 106; 107, 117;
126; 127; 131; 132; 146;
148; 151

Under The Resource Management Act
1991

IN THE MATTER of an appeal to the Environment
Court against decisions on the
proposed Queenstown Lakes
District Council Proposed District
Plan (stage 1)

BETWEEN **FEDERATED FARMERS OF NEW
ZEALAND INC**

(ENV-2018-CHC-053)

...(continued in Appendix A)

Appellant

AND **QUEENSTOWN LAKES
DISTRICT COUNCIL**

Respondent

**MEMORANDUM OF COUNSEL FOR THE ALPINE GROUP LIMITED TO
PARTIALLY WITHDRAW INTEREST IN APPEALS**

**GALLAWAY COOK ALLAN
LAWYERS
DUNEDIN**

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MEMORANDUM OF COUNSEL**MAY IT PLEASE THE COURT:**

1. The Alpine Group Limited joined as a section 274 party to a range of appeals against the Queenstown Proposed District Plan. The Alpine Group wishes to withdraw some or part of those notices as follows:
 - (i) NZ Tungsten Mining Limited (ENV-2018-CHC-151) – All matters other than appeals in relation to rule 21.10.1 which addresses Informal Airports on public conservation and crown pastoral lease land.
 - (ii) Remarkables Park Limited (ENV-2018-CHC-126) – withdraw entire section 274 interest.
 - (iii) Treble Cone Investments Limited (ENV-2018-CHC-107) – withdraw entire section 274 interest.
 - (iv) Soho Ski Area/Blackmans Creek (ENV-2018-CHC-104) – withdraw entire section 274 interest.
 - (v) Clive Manners Wood - [ENV-2018-CHC-57] – All matters other than those related to Informal Airports in Chapter 21 and 36.
 - (vi) Federated Farmers (ENV-2018-CHC-053) – withdraw entire section 274 interest.
 - (vii) Department of Conservation (ENV-2018-CHC-078) – withdraw entire section 274 interest.
 - (viii) Royal Forest and Bird Society – withdraw from all matters other than relief sought to add a new standard to Table 2 related to winter crops and Proposed Rule 21.5.7 related to stock standing in the bed of a waterway.
 - (ix) Allenby Farms (ENV-2018-CHC-148) – withdraw entire section 274 interest.
 - (x) Jeremy and Lesley Burdon (ENV-2018-CHC-091) - withdraw entire section 274 interest.

- (xi) Mt Cardrona Station Limited (ENV-2018-CHC-083) – Withdraw entire section 274 interest.
 - (xii) Loch Linnie Station (ENV-2018-CHC-068) – withdraw entire section 274 interest.
 - (xiii) Fairfax and others (ENV-2018-CHC-096) – withdraw from all matters other than Chapter 21 and Chapter 36 as they relate to Informal Airports
 - (xiv) Cardrona Alpine Resort Limited (ENV-2018-CHC-117) – withdraw entire section 274 interest. I
 - (xv) Te Anau Developments Limited (ENV-2018-CHC-106) – withdraw entire section 274 interest.
 - (xvi) Real Journeys Limited (ENV-2018-CHC-131) – withdraw from all matters other than those associated with Rule 21.15.7 and 21.15.8
 - (xvii) Aircraft Owners and Pilots Association (ENV-2018-CHC-132) – withdraw from all matters other than those related to Informal Airports in Chapter 21 and 36.
 - (xviii) Real Journeys (trading as Canyon Food and Brew Company Limited) (ENV-2018-CHC-146) – withdraw entire section 274 interest.
 - (xix) Upper Clutha Environmental Society (ENV-2018-CHC-056) – withdraw entire section 274 interest.
2. Alpine remains interested in the whole of the following appeals:
- (i) Wakatipu Holdings Limited (ENV-2018-CHC-118)
3. For avoidance of doubt Alpine does not wish to be heard in relation to Topic 1 and 2 following the withdrawal of its section 274 interests as outlined above it no longer has an interest in matters to be mediated in Topic 4 – Indigenous Vegetation and Biodiversity.

A handwritten signature in blue ink, appearing to read "Bridget Irving". The signature is written in a cursive style with a large initial 'B'.

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Bridget Irving / Simon Peirce

Counsel for The Alpine Group Limited

Dated 26 November 2018

Appendix A:

- [ENV-2018-CHC-106] Te Anau Developments Limited v Queenstown Lakes District Council
- [ENV-2018-CHC-126] Remarkables Park Limited v Queenstown Lakes District Council
- [ENV-2018-CHC-127] Queenstown Park Limited v Queenstown Lakes District Council
- [ENV-2018-CHC-131] Real Journeys Limited v Queenstown Lakes District Council
- [ENV-2018-CHC-146] Real Journeys Limited (trading as Canyon Food and Brew Company Limited) v Queenstown Lakes District Council
- [ENV-2018-CHC-151] NZ Tungsten Mining Limited v Queenstown Lakes District Council
- ENV-2018-CHC-107] Treble Cone Investments Limited V Queenstown Lakes District Council
- ENV-2018-CHC-104] Soho Ski Area/Blackmans Creek v Queenstown Lakes District Council
- ENV-2018-CHC-057] Clive Manners Wood v Queenstown Lakes District Council
- ENV-2018-CHC-053] Federated Farmers v Queenstown Lakes District Council
- ENV-2018-CHC-078] Department of Conservation v Queenstown Lakes District Council
- ENV-2018-CHC-148] Allenby Farms v Queenstown Lakes District Council
- ENV-2018-CHC-091] Jeremy and Lesley Burdon v Queenstown Lakes District Council
- ENV-2018-CHC-083] Mt Cardrona Station Limited v Queenstown Lakes District Council
- ENV-2018-CHC-086] Loch Linnie Station v Queenstown Lakes District Council
- ENV-2018-CHC-096] Fairfax and Others v Queenstown Lakes District Council
- ENV-2018-CHC-117] Cardrona Alpine Resort Limited v Queenstown Lakes District Council

ENV-2018-CHC-132] Aircraft Owners and Polits Association v Queenstown
Lakes District Council

ENV-2018-CHC-056] Upper Clutha Environmental Society v Queenstown
Lakes District Council