IN THE HIGH COURT OF NEW ZEALAND **CIV-**
INVERCARGILL REGISTRY

I TE KŌTI MATUA O AOTEAROA
WAIHŌPAI ROHE

UNDER THE	Judicial Review Procedure Act 2016
IN THE MATTER OF	an application for review of a decision to adopt the Freedom Camping Bylaw 2025
BETWEEN	**NEW ZEALAND MOTOR CARAVAN ASSOCIATION INCORPORATED**, an incorporated society having its registered office at 4 Graham Road, Takanini, 2112 **Applicant**
AND	**QUEENSTOWN LAKES DISTRICT COUNCIL,** a local authority constituted by the Local Government (Otago Regional) Reorganisation Order 1989, and having its head office at 10 Gorge Road, Queenstown 9300 **Respondent**

STATEMENT OF CLAIM

23 November 2026

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THE APPLICANT SAYS:

The parties

1. The applicant, New Zealand Motor Caravan Association Incorporated (*NZMCA*), is an incorporated society (Number 223863):

    a. that represents the interests of over 124,000 individual members; and

    b. whose objects include monitoring, promoting, protecting and advocating for the collective interests and benefits of the NZMCA and its members in all matters, whether legislative, regulatory or otherwise that may affect motor caravan activities.

2. The respondent, Queenstown Lakes District Council (the *Council*), is a territorial authority as defined in the Local Government Act 2002 (the *LGA*).

Regulatory context

3. The Freedom Camping Act 2011 (the *FCA*) regulates freedom camping on land controlled or managed by local authorities, Waka Kotahi NZTA, the Department of Conservation, and Toitū Te Whenua Land Information New Zealand.

4. The FCA establishes a presumption that freedom camping is allowed in any "local authority area" (as defined under section 6 of the FCA), unless it is restricted or prohibited under a freedom camping bylaw made under section 11 of the FCA or under any other enactment.

5. Freedom camping on land gazetted as a reserve under the Reserves Act 1977 (*reserve land*) in a local authority area is governed by both the FCA and the Reserves Act 1977.

6. The Minister of Conservation has delegated the Minister's power of consent to the Council to authorise freedom camping on reserve land that is managed or controlled by the Council.

Background

The 2012 Bylaw

7. On 9 December 2012, the Council adopted the Freedom Camping Bylaw 2012 (the *2012 Bylaw)*.

8. From 2012, the NZMCA raised concerns with the Council that the 2012 Bylaw did not comply with the FCA.

9. On 12 December 2019, the Council resolved to revoke the 2012 Bylaw effective as at 13 December 2019.

Approval of freedom camping at Luggate Red Bridge Reserve

10. On 12 December 2019, the Council agreed to exercise its delegated power under s 44(1) of the Reserves Act 1977 to allow for freedom camping at Luggate Red Bridge Reserve.

11. On 9 October 2025, the Council revoked the 2019 ministerial consent and replaced it with a consent allowing freedom camping at Luggate Red Bridge Reserve subject to specified conditions.

The 2019 Bylaw

12. On 12 December 2019, the Council adopted the Freedom Camping Bylaw 2019 (the *2019 Bylaw*).

13. In March 2021, the NZMCA filed a judicial review challenging the 2019 Bylaw, including on the grounds that the 2019 Bylaw effectively carried over the 2012 Bylaw and that the Council did not review the 2012 Bylaw before adopting the 2019 Bylaw.

14. In December 2021, the Council decided to revoke the 2019 Bylaw and the NZMCA then discontinued its judicial review claim.

15. In March 2022, the High Court declined to award costs to the Council in relation to the discontinued judicial review claim, including on the basis that the QLDC's failure to carry out site assessments in relation to the 2019 Bylaw provided the NZMCA with a "very strong ground of review".

The 2021 Bylaw

16. In December 2021, the Council adopted the Freedom Camping Bylaw 2021 (*the 2021 Bylaw)*.

17. On 21 December 2022, the NZMCA filed a judicial review challenging the 2021 Bylaw, including on the basis that it was tainted by the inclusion of irrelevant considerations, including the consideration of amenity values and economic values.

18. On 20 September 2024, the High Court quashed the 2021 Bylaw on the basis that it was tainted by the inclusion of irrelevant considerations, being the protection of economic values of an area and the protection of amenity values of an area.

Development of 2025 Bylaw

19. On 20 March 2025, the Council:

    a. received advice as to its options for regulating freedom camping in the Queenstown Lakes District; and

    b. decided that a bylaw under the FCA was required to address freedom camping in the district.

20. The official advice provided to the Council on 20 March 2025 presented the use of Reserve Management Plans under the Reserves Act 1977 as an alternative to a new freedom camping bylaw.

21. On 15 April 2025, at a Council workshop, the Council directed that Council controlled or managed reserve land should be managed under the Reserves Act 1977 and the balance of Council controlled and/or managed land should be managed under a freedom camping bylaw.

22. On 22 May 2025, at a Council workshop:

    a. Council officers advised that allowing freedom camping on non-reserve land only under a freedom camping bylaw "may create a regulatory response that isn't fit for purpose, difficult for campers to understand, and tricky to monitor/enforce", and recommended a modified approach that included no less than 13 reserve land areas in their site assessments; but

    b. on balance, councillors expressed a preference to avoid freedom camping on reserve land where possible, and to rely on the Reserves Act 1977 to manage freedom camping on reserve land if necessary.

23. During the decision-making process reflected in the 20 March 2025 advice, 15 April 2025 workshop, and 22 May 2025 workshop, the Council expressed a preference that a bylaw under the FCA be developed for Council controlled or managed land, except for reserve land.

The Tonkin & Taylor report

24. Prior to, or during, May 2025, the Council engaged Tonkin & Taylor to assess the effects of freedom camping on land controlled or managed by the Council (the *technical assessment*).

25. The land assessed as part of the technical assessment included a number of Waka Kotahi New Zealand Transport Agency (*NZTA*) parcels that were pre-selected by the Council.

26. To undertake the technical assessment, Tonkin & Taylor:

    a. identified all land controlled or managed by the Council;

    b. undertook a desktop assessment of all land controlled or managed by the Council (and the NZTA land referred to at paragraph [25] above) involving the application of criteria it deemed relevant to freedom camping (the *area-wide assessment*); and

    c. undertook a desktop site-specific assessment of 122 carpark areas (the *site-specific assessment*).

27. Following the area-wide assessment and site-specific assessment, Tonkin & Taylor categorised Council controlled or managed land into the following categories:

    a. 'hard constraint', where there are high adverse impacts from freedom camping such that freedom camping is not recommended;

    b. 'consider constraint', where moderate adverse impacts of freedom camping are present such that freedom camping is recommended only with restrictions; and

    c. 'no constraint', where there are low to very low impacts of freedom camping such that minor restrictions, control or mitigation measures may be recommended.

28. After Tonkin & Taylor began the technical assessment, the Council instructed it to apply a 'hard constraint' to all reserve land controlled or managed by the Council as part of its area-wide assessment.

29. The area-wide assessment resulted in approximately 56,000 hectares mapped with 'hard constraints' present, approximately 2,200 hectares mapped with 'consider constraints' present, and approximately 80 hectares mapped as 'no constraints'.

30. The site-specific assessment was undertaken only in relation to 122 specific areas identified by the Council for assessment, which consisted of:

    a. carparking areas mapped in the area-wide assessment located outside of reserve land;

b. a select number of additional carparking areas wholly or largely on reserve land that the Council identified for consideration; and

c. a select number of NZTA areas that the Council identified for consideration.

31. The site-specific assessment:

a. assessed all on-street parking as unsuitable for freedom camping on the grounds that a freedom camping prohibition was necessary to protect the health and safety of campers and the general public; and

b. resulted in a recommendation that freedom camping be prohibited on 90 of the 122 carpark areas considered.

32. In June 2025, a report based on the technical assessment was completed (the *Tonkin & Taylor report*).

33. The Tonkin & Taylor report:

a. concluded that 29 areas were suitable for freedom camping with restrictions and controls; and

b. recommended that, in considering whether to impose prohibitions or controls on freedom camping in areas with constraints noted, the Council consider whether it can reasonably implement the recommended mitigation and/or control measures, and then consider whether allowing freedom camping will still allow the adequate protection of access to the areas, of the health and safety of people in the area, and of the area.

Preparation of draft bylaw

34. Informed by the Tonkin & Taylor report, Council officers prepared a draft bylaw under the FCA (the *draft 2025 bylaw)*.

35. The draft 2025 bylaw provided that:

a. it does not apply to any local authority area that is a reserve under the Reserves Act 1977;

b. freedom camping in any tent or temporary structure is prohibited in any local authority area;

c. freedom camping in any non-self-contained motor vehicle is prohibited in any local authority area;

d. freedom camping is permitted in fifteen specific areas and on certain 'rural roads' across the district outside of the active road corridor, provided that the person complies with eight specified conditions; and

e. freedom camping is not otherwise allowed in any local authority area.

36. On 26 June 2025, Council officers presented the Council with a report recommending adoption of the draft 2025 bylaw for formal consultation (the *June 2025 report*), along with a copy of the draft 2025 bylaw, a statement of proposal, and the Tonkin & Taylor report.

37. On 26 June 2025, the Council adopted the draft 2025 Bylaw for consultation.

Public consultation

38. From 8 July 2025 to 8 August 2025, the Council undertook public consultation on the draft 2025 bylaw.

39. A panel of elected members of the Council was convened to receive public submissions (the *Hearing Panel*).

40. On 26 August 2025, Council officers presented the Hearing Panel with a report on public submissions received on the draft 2025 bylaw (the *August 2025 report*).

41. The August 2025 report:

a. noted that it was not known how many sites among the rural roads would satisfy the proposed conditions for freedom camping on rural roads; and

b. recommended that the Hearing Panel receive all submissions received and recommend to the Council that it adopt the draft 2025 bylaw with amendments.

42. On 28 August 2025, the Hearing Panel resolved to receive the submissions and recommend to Council a final form of the draft 2025 bylaw.

43. On 9 October 2025, Council officers presented the Council with a report on the amended draft 2025 bylaw (the *9 October report*), which recommended that the Council adopt the draft 2025 bylaw with the changes recommended as an outcome of the consultation process.

The 2025 Bylaw

44. On 9 October 2025, the Council adopted the Freedom Camping Bylaw 2025 (the *2025 Bylaw*).

45. The 2025 Bylaw:

    a. does not apply to any local authority area that is a reserve under the Reserves Act 1977;

    b. prohibits freedom camping:

        i. in the local authority areas identified in Schedule 2 of the bylaw;

        ii. in any tent or temporary structure in any local authority area;

        iii. in non-self-contained motor vehicles in any local authority area; and

    c. permits freedom camping with restrictions in fifteen areas specified in Schedule 1A of the bylaw, and on rural roads specified in Schedule 1B of the bylaw outside of the active road corridor, subject to conditions specified under the bylaw.

46. Under the 2025 Bylaw as originally adopted, freedom camping was either restricted or prohibited in all local authority areas except for the areas described at paragraph [49] below to which freedom camping restrictions or prohibitions were added in February 2026.

47. On 1 December 2025, the 2025 Bylaw came into effect.

2026 amendments

The 5 February amendments

48. On 5 February 2026, the Council amended the 2025 Bylaw (*the 5 February 2026 amendments*).

49. The 5 February 2026 amendments:

    a. applied freedom camping restrictions to additional areas, namely to rural roads at Hāwea Flat and the Arrowtown access road from Centennial Avenue to Arrow River Bridges Trail; and

    b. applied freedom camping prohibitions to additional areas, namely to urban area roads in Cardrona Village, urban area roads in Makarora,

areas at Hāwea Flat, a parcel between the lake and reserve at Glendhu Bay, and an area at Victoria Flats Landfill; and

c. removed the carparking area off Robertson Street in Frankton from the coverage of the 2025 Bylaw on the basis that it is reserve land.

50. On 12 February 2026, the Council gave public notice of the 5 February 2026 amendments.

51. The Council did not follow the special consultative procedure set out in section 83 of the Local Government Act 2002 in making the 5 February 2026 amendments.

52. The 5 February 2026 amendments increased the extent of freedom camping prohibitions and restrictions in Queenstown Lakes District.

53. As a result of the 5 February 2026 amendments, under the 2025 Bylaw, freedom camping is either restricted or prohibited in all local authority areas covered by the bylaw.

Proposed amendments

54. Prior to June 2026, the Council directed Council officers to consider options in relation to possible issues arising from freedom camping at the Allenby Place Carpark, Beacon Point Road, and Wānaka Recreation Centre, which are restricted freedom camping areas.

55. On 25 June 2026, Council officers recommended to the Council that no changes be made to freedom camping restrictions at Allenby Place carpark, Beacon Port Road, and Wānaka Recreation Centre.

56. At its 25 June 2026 meeting, the Council decided to propose amendments to the 2025 Bylaw to:

a. prohibit freedom camping at the current restricted freedom camping area at Allenby Place carpark;

b. apply a summer prohibition condition to the restricted freedom camping area at Beacon Point Road carpark; and

c. increase the number of designated freedom camping spaces at Wānaka Recreation Centre from 18 to 21 (*the proposed amendments to the 2025 Bylaw).*

57. On 23 July 2026, the Council adopted a statement of proposal for community consultation on the proposed amendments to the 2025 Bylaw.

58. Consultation on the proposed amendments to the 2025 Bylaw took place from 27 July to 31 August 2026.

NZMCA's efforts to seek reconsideration of reserve land

59. On 5 November 2025, 15 January 2026 and 18 February 2026, NZMCA emailed the Council regarding the timeframes for the Council to investigate potential freedom camping on reserve land under the Reserves Act 1977.

60. On 23 February 2026, a Council officer advised NZMCA by email that "further technology solutions to support freedom camping and other land, including reserves" would be discussed at a Council workshop on 16 April 2026.

61. On 30 March 2026, NZMCA staff members met with the Council's Mayor John Glover and Acting CEO Michelle Moss to discuss freedom camping solutions, including Council revisiting its decision to exclude reserve land from the process that led to the 2025 Bylaw.

62. At a Council workshop on 16 April 2026, Council officers briefly indicated that the potential use of reserve land for freedom camping might be explored in the Council's 2026/27 financial year, however the Council did not make any commitments to undertake this work.

63. On 1 May 2026, the NZMCA wrote to Mayor John Glover reserving its position in relation to the legality of the 2025 Bylaw and the processes followed to adopt it.

6 October 2026 Council workshop

64. On 6 October 2026, a Council workshop was held to consider additional freedom and low-cost camping opportunities, including freedom camping on reserve land.

65. At the workshop, Council staff sought direction from elected members on whether to assess reserve sites for potential freedom camping or low-cost camping opportunities. However, the Council decided not to proceed with this work.

Decisions reviewable

66. The Council's decisions concerning the regulation of freedom camping, including the decisions relating to the formulation and adoption of the 2025 Bylaw and amendments to it, are statutory decisions and/or decisions amendable to judicial review that affect the rights and interests of NZMCA's members.

First cause of action: bylaw is ultra vires

Wrong approach to assessing appropriateness and proportionality of prohibitions and restrictions

67. Before adopting the 2025 Bylaw, the Council was required to undertake a genuine assessment of whether the specific prohibitions and restrictions in the draft 2025 Bylaw were the most appropriate and proportionate means of addressing the relevant perceived problems in relation to the areas in question.

68. When developing the draft 2025 bylaw and adopting the 2025 Bylaw, the Council:

    a. assessed whether it was necessary to adopt "a bylaw" to protect the purposes in section 11(2) of the FCA, rather than assessing whether it was necessary to adopt the draft 2025 bylaw specifically; and

    b. assessed whether a bylaw generally was the most appropriate and proportionate way of addressing the problems identified with freedom camping in the district, rather than assessing whether the specific prohibitions and restrictions proposed in the draft 2025 bylaw were the most appropriate and proportionate way of addressing the perceived problems in relation to specific sites.

69. The Council accordingly erred in its approach to exercising its powers under section 11 of the FCA to develop a freedom camping bylaw.

Unduly limited approach to site-specific assessments

70. Rather than proceeding from a starting point that freedom camping can occur without restriction or prohibition unless a bylaw is necessary to protect the area, the health and safety of people visiting the area, or access to the area, the area-wide assessment by Tonkin & Taylor instead identified approximately 80 hectares of land where it advised freedom camping could conceivably occur without the need for controls to protect the area, health and safety, or access to the area.

71. Tonkin & Taylor undertook a site-specific assessment of the potential issues arising from freedom camping, and the extent of restrictions or prohibitions required to address those issues, only in relation to 122 specific carparking areas.

72. The carparking areas assessed on a site-specific basis were pre-selected by the Council without genuine consideration of the grounds for restricting or prohibiting freedom camping elsewhere under section 11 of the FCA.

73. When developing the draft 2025 bylaw and adopting the 2025 Bylaw, the Council did not undertake a site-specific assessment of the potential issues arising from freedom camping, and the extent of restrictions or prohibitions required to address those issues, in relation to any areas other than carparking areas that it directed Tonkin & Taylor to assess.

74. As a result, the Council erred in its approach to exercising its powers under section 11 of the FCA by pre-selecting areas for a site-specific assessment without properly assessing the necessity of restrictions or prohibitions on the areas not selected for that assessment.

Failure to properly consider on-street parking

75. During the technical assessment, Tonkin & Taylor assessed on-street parking as unsuitable for freedom camping on a blanket basis.

76. When developing the draft 2025 bylaw and adopting the 2025 Bylaw, the Council did not specifically consider the potential issues arising from freedom camping, and the extent of restrictions or prohibitions required to address those issues, in relation to any specific on-street parking areas.

77. As a result, the Council erred in its approach to exercising its powers under section 11 of the FCA to make a bylaw with respect to freedom camping in on-street parking areas.

Failure to properly consider tenting

78. Under the FCA, a local authority is precluded from making a freedom camping bylaw that has the effect of prohibiting freedom camping in all the local authority areas in the district.

79. Under the FCA, freedom camping by tent or other temporary structure is permitted in any local authority area unless restricted or prohibited by a freedom camping bylaw or any other legislation.

80. The 2025 Bylaw prohibits freedom camping by tent in all local authority areas covered by the bylaw.

81. During the technical assessment, Tonkin & Taylor did not consider the impacts of freedom camping by tent specifically.

82. When developing the draft 2025 bylaw and adopting the 2025 Bylaw, the Council:

    a. did not assess the impacts of freedom camping by tent on any local authority area; and

    b. did not genuinely consider if any impacts from freedom camping by tent to the section 11(2)(a) factors could be addressed in an appropriate and proportionate way by regulation under a freedom camping bylaw.

83. As a result, the Council erred in its approach to exercising its powers under section 11 of the FCA to make a bylaw with respect to freedom camping by tent.

Failure to adequately consider freedom camping on rural roads

84. The 2025 Bylaw allows for restricted freedom camping on specified rural roads subject to conditions specified under the bylaw.

85. When developing the draft 2025 bylaw and adopting the 2025 Bylaw, the Council did not assess the practical effect of the proposed restrictions on freedom camping on rural roads and extent to which freedom camping would be practically possible on the specified rural roads given the nature of the conditions.

    Particulars

    a. In the August 2025 report, Council officers noted that "the precise number and location of sites across the rural road network that could satisfy the conditions set out in clause 8.3 are not known."

86. As a result, in developing the draft 2025 bylaw, and in adopting the 2025 Bylaw, the Council did not specifically consider whether the extent of restrictions or prohibitions on freedom camping on any rural roads was necessary to address the section 11(2)(a) factors or was the most appropriate and proportionate way to address the perceived problems arising from freedom camping in those areas.

Failure to undertake holistic assessment

87. In making a district-wide assessment of what regulatory response was required to address perceived problems with freedom camping, the Council did not assess all local authority land.

88. The Council did not undertake an assessment of whether the draft 2025 Bylaw, viewed as a whole, represented the most appropriate and proportionate regulatory response available under the FCA to address the perceived problems identified under section 11(2).

89. Accordingly, the Council could not lawfully have been satisfied that the requirements of section 11(2) of the FCA were met.

Unduly prohibitive assessment overall

90. The failures of process described above at [67]-[89] tainted the Council's decision-making process in developing the draft 2025 bylaw and in adopting the 2025 Bylaw.

91. As a result of the facts outlined at [67]-[89] above, the Council has adopted a bylaw that:

    a. prohibits freedom camping of any kind on a blanket basis across most local authority areas covered by the bylaw;

    b. prohibits freedom camping by tent in all local authority areas covered by the bylaw;

    c. prohibits freedom camping of any kind across an indeterminate number of rural roads covered by the bylaw;

    d. does not allow for freedom camping without restriction in any local authority areas covered by the bylaw; and

    e. does not purport to cover reserve land, and therefore does not provide for regulated freedom camping on any reserve land.

92. The extent of prohibitions and restrictions described at paragraph [91] above is more than is necessary or proportionate to address the perceived problems arising from freedom camping in the areas where freedom camping is restricted or prohibited.

93. As a result of the facts outlined at [67]-[92] above, the Council acted outside the powers conferred by section 11 of the FCA in adopting the 2025 Bylaw.

Second cause of action: error of law and/or failure to consider mandatory relevant matters

94. In considering where restrictions or prohibitions on freedom camping on local authority areas might be required under the FCA, the Council is required to consider all land that is a local authority area, including reserve land controlled or managed by the Council.

95. In exercising its powers under the Reserves Act 1977, the Council is required to have regard to the objective and purposes of the FCA.

96. When assessing the need for controls on freedom camping, and in developing the draft 2025 bylaw and adopting the 2025 Bylaw, the Council failed to consider the availability of reserve land for freedom camping.

97. The Council instructed Tonkin & Taylor to treat all reserve land as a "hard constraint" as part of the area-wide assessment undertaken by Tonkin & Taylor.

98. As a result of the Council's instruction, during the area-wide assessment, Tonkin & Taylor did not assess:

    a. the extent of potential problems arising from freedom camping on reserve land;

    b. whether a bylaw or other regulatory response was necessary to protect the section 11(2)(a) factors with respect to that reserve land; and

    c. what restrictions or prohibitions, if any, were most appropriate or proportionate to address the identified problems with freedom camping on that reserve land.

99. After receiving the Tonkin & Taylor report, the Council disregarded on a blanket basis the areas of reserve land that were considered by Tonkin & Taylor as part of the site-specific assessment from consideration for the rest of the process of developing the draft 2025 bylaw.

100. The effect of the Council's direction was to exclude a class of relevant land for freedom camping from the process of assessing the necessity of a freedom camping bylaw and the appropriateness and proportionality of any restrictions on freedom camping.

101. When assessing the need for controls on freedom camping, and in developing the draft 2025 bylaw and adopting the 2025 Bylaw, the Council did not genuinely consider:

    a. whether regulating freedom camping on reserve land through a freedom camping bylaw, a reserve management plan under the Reserves Act 1977, the exercise of delegated authority under that Act, or a combination of those mechanisms, was necessary to address any problems with freedom camping on reserve land; and

    b. whether a prohibition on freedom camping in all areas of reserve land (excluding the Luggate Red Bridge Reserve) was the most appropriate and proportionate way of addressing any perceived problems relating to freedom camping in those areas; and

    c. whether making reserve land available for freedom camping through a freedom camping bylaw, a reserve management plan under the Reserves Act 1977, the exercise of delegated authority under that Act, or a combination of those mechanisms, could assist in managing the impacts of freedom camping on the factors identified in section 11(2)(a) in other areas of the district.

102. Because of the Council's failure to consider the availability of reserve land for freedom camping, the Council's decision-making under the FCA, including the decisions around formulation and adoption of the 2025 Bylaw, has:

    a. unjustifiably limited freedom camping within the Queenstown Lakes District; and

    b. unjustifiably limited the right of NZMCA members to freedom camp in the Queenstown Lakes District.

Third cause of action: amendment is ultra vires

103. To amend the 2025 Bylaw, the Council is required to use the special consultative procedure set out in section 83 of the Local Government Act 2002, unless the amendment is minor or is to correct an error, and does not affect an existing right, interest, title, immunity, or duty of any person to whom the bylaw applies.

104. The 5 February 2026 amendments affect an existing right of persons to whom the 2025 Bylaw applies by increasing the extent of freedom camping restrictions and prohibitions in the Queenstown Lakes District.

105. In making the 5 February 2026 amendments, the Council did not use the special consultative procedure.

106. Because of its failure to use the special consultative procedure, the Council acted outside the powers conferred by section 11B of the FCA in making the 5 February 2026 amendments.

Relief sought

107. The applicant seeks:

a. a declaration that the Council's decision to adopt the 2025 Bylaw is invalid;

b. an order quashing or setting aside the Council's decision to adopt the 2025 Bylaw;

c. a declaration that the Council's decision to make the 5 February 2026 amendments is invalid;

d. an order quashing or setting aside the Council's decision to make the 5 February 2026 amendments; and

e. such further relief as the Court considers appropriate.

Costs

108. The applicant seeks orders for the costs of bringing this proceeding.

This statement of claim is filed by Thomas Hugh Bennion of Bennion Law, solicitor for the applicant, whose address for service is PO Box 25433, Wellington.

Documents for service on the applicant may be delivered to that address or may be emailed to counsel instructed to act at craig.linkhorn@cliftonchambers.co.nz and oliver@oliverneas.co.nz.