

**BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL HEARING
PANEL**

IN THE MATTER of the Resource Management Act
1991

AND the renotification of two submissions
on Stage 1 of the Queenstown Lakes
Proposed District Plan concerning the
zoning of land at Arthur's Point by
Gertrude's Saddlery Limited and
Larchmont Developments Limited

**MEMORANDUM OF COUNSEL ON BEHALF OF ARTHURS POINT
OUTSTANDING NATURAL LANDSCAPE SOCIETY INCORPORATED**

Rescheduled Hearing Dates

Dated 1 November 2022

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MAY IT PLEASE THE PANEL

1. This memorandum is filed on behalf of the Arthurs Point Outstanding Natural Landscape Society Incorporated (**Society**). It relates to the revised hearing directions contained in the Panel's recent Minute.¹
2. The Society is calling two expert witnesses – Mr Stephen Brown (landscape and visual) and Mr Brett Giddens (planning).
3. Mr Brown has advised he is in Canada and unable to attend a hearing on 1 to 3 February. Mr Brown commenced preparation for this hearing in June 2022 so is well advanced on his evidence and opinions. Accordingly, it would be prejudicial to the Society for the hearing to proceed in Mr Brown's absence.
4. In addition, the Society understands very few further submitters will be professionally represented by counsel and/or expert witnesses (the Society is only aware of one other party² intending to call an expert and possibly engage legal assistance as well). As such, the Society expects the Panel will derive considerable assistance from the expert evidence and legal submissions tendered by the Society – including that of Mr Brown.
5. Mr Brown has advised he is available from 17 February 2023. At this stage, neither Mr Giddens or Counsel have any scheduled court commitments and therefore can also be available for other dates in February, March or April.
6. The Society therefore respectfully requests that the 1 to 3 February dates are vacated and other suitable dates are found. If it would assist, the Society is happy to engage with the hearing administrator as to dates or attend a brief pre-hearing conference.

Dated this 1st day of November 2022



Alanya Limmer
Counsel for Arthurs Point Outstanding Natural
Landscape Society Incorporated

¹ Dated 26 October 2022.

² Aside from Gertrude Saddlery Limited and Larchmont Limited; and excluding Council's Reporting Officers.