

Before the Independent Hearing Panel

Under the Resource Management Act 1991

In the matter of submissions on variation to introduce landscape schedules 21.22 and 21.23 into Chapter 21 Rural Zone of the Proposed District Plan.

Memorandum of Counsel

26th August 2026

Submitter's solicitors:

Maree Baker-Galloway | Hannah Zydenbos
Anderson Lloyd
Level 2, 13 Camp Street, Queenstown 9300
PO Box 201, Queenstown 9348; or
p + 64 3 450 0700
maree.baker-galloway@al.nz | hannah.zydenbos@al.nz

**anderson
lloyd.**

May it please the Panel

- 1 This memorandum of Counsel is prepared on behalf of Eirc Hopgood (**Hawthenden**) (submitter #50), with regards to the directions of the Panel contained in Minute 4, dated 22 April 2026. Minute 4 directed submitter legal submissions to be filed by 12 noon on Wednesday 26 August 2026.
- 2 Counsel seeks leave for an extension to this filing deadline for the Hawthenden legal submissions until 28 August 2026 for the following reasons:
 - (a) Mr Hopgood is scheduled to be heard at the end of the hearing week, in the afternoon of Thursday 3 September.
 - (b) In terms of legal argument and themes, the submissions will reflect submissions already filed for Anderson Lloyd clients, submitters OS47, OS 39, OS36.
 - (c) Counsel are still finalising the detail of the lay evidence that will be presented, and will be in a position to finalise the legal submissions when that is finalised also.

Dated this 26th day of August 2026

Maree Baker-Galloway

Maree Baker-Galloway / Hannah Zydenbos
Counsel for the Applicant