

**BEFORE THE HEARINGS PANEL  
APPOINTED BY THE QUEENSTOWN LAKES DISTRICT COUNCIL**

**UNDER**

the Resource Management Act 1991

**IN THE MATTER**

of submissions on a Variation to a  
Proposed District Plan under schedule 1  
of the Act

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**JOINT MEMORANDUM OF COUNSEL FOR SUBMITTERS**

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Dated: 18 December 2023

**Solicitor acting**

G M Todd / B B Gresson  
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**Counsel instructed**

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**MAY IT PLEASE THE PANEL:**

- [1] The date for lodgement of submitter evidence is 12 noon, 19 December 2023.
- [2] Mr Fraser Colegrave, economic expert, is preparing statements of evidence for the parties to this joint memorandum (**parties**). The parties also intend to call planning evidence and corporate evidence which will rely in part on Mr Colegrave's evidence.
- [3] Mr Colegrave has fallen ill this past week which has delayed him being able to complete his evidence by the due date of 19 December 2023.
- [4] Given this, the parties respectfully seek an extension to **Friday 22 December 2023** for his evidence, and the parties' planning evidence and corporate evidence, to be lodged.
- [5] The parties consent to a corresponding extension for the Queenstown Lakes District Council to lodge any rebuttal evidence to the parties' evidence by **14 February 2024**.
- [6] Given the hearing date of 27 February 2024, the parties do not consider any prejudice will arise as a result of the extension for the lodgement of the evidence.

Dated: 18 December 2023



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B J Matheson / B B Gresson  
Counsel for Willowridge Developments Limited



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I Gordon  
Counsel for Queenstown Central Ltd., Millbrook Country Club Ltd.,  
Homestead Bay Trust Ltd



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R Wolt  
Counsel for Trojan Helmet Limited and Boxer Hill Trust



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S J Simons  
Counsel for Fulton Hogan Land Development Limited



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J Brabant  
Counsel for Ladies Mile Property Syndicate Limited Partnership