

Under the Resource Management Act 1991 (**RMA**)

In the matter of Priority Area Landscape Schedules Variation to the
Queenstown Lakes Proposed District Plan

**Memorandum of counsel on behalf of various submitters and further submitters
represented by Anderson Lloyd**

11 October 2023

Submitters' solicitors:

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**anderson
lloyd.**

May it please the Panel

- 1 This memorandum of counsel is provided on behalf of various submitters and further submitters represented by Anderson Lloyd, in respect of the direction at paragraph 9.8 of the Hearing Panel Directions 1, regarding length of legal submissions.

- 2 On 24 October Anderson Lloyd is appearing for the following:
 - (a) Sir Robert Stewart
 - (b) RealNZ Limited
 - (c) Catherine and Christopher Phoon
 - (d) Hansen Family Partnership
 - (e) Jon Waterston
 - (f) Queenstown Adventure Park
 - (g) Rock Supplies NZ Limited
 - (h) The Station at Waitiri Limited
 - (i) Grant Stalker Family Trust
 - (j) Maryhill Limited
 - (k) Gertrudes Saddlery Limited

- 3 And on November 8 Anderson Lloyd is appearing for:
 - (a) Glencoe Station Limited and Glencoe Land Development Company Limited
 - (b) Coneburn Preserve Holdings Limited and Henley Downs Farm Holdings Limited'
 - (c) Blackmans Creek Holdings 1 LP
 - (d) Mount Cardrona Station Limited
 - (e) Jeremy Burdon, Jo Batchelor, Andrea Donaldson
 - (f) Allenby Farms Limited
 - (g) Silverlight Studies Limited

(h) Robert and Pamela McRae

- 4 Anderson Lloyd is not intending on presenting separate legal submissions for each of the individual submitters (up to 20 pages).
- 5 Anderson Lloyd will present consolidated cases in the interest of efficiency and avoiding unnecessary duplication.
- 6 However, given the breadth and variety of issues for the numerous submitters, one set of only 20 pages will not ensure a fair opportunity for each submitter's interests to be properly covered.
- 7 While it is considered leave is not technically required, given that each submitter has an equal entitlement for legal representation at the hearing, out of the abundance of caution this memorandum is to provide notice that Anderson Lloyd will be filing legal submissions for its clients the day before each appearance in Queenstown and Wanaka, that will in total exceed 20 pages, but that collectively, will be an efficient consolidation and grouping of the range of issues for its 19 clients (and significantly less than 20 pages per client).

Dated this 10th day of October 2023

Maree Baker-Galloway

Maree Baker-Galloway/Rosie Hill
Counsel for various submitters to the landscape schedules