

Before the Queenstown Lakes District Council Hearing Panel

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

In the matter of 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 Enterprises Limited

Memorandum of Counsel on behalf of Gertrude's Saddlery Limited and Larchmont Enterprises Limited

26 January 2023

Submitters' solicitors:

Maree Baker-Galloway | Rosie Hill
Anderson Lloyd
Level 2, 13 Camp Street, Queenstown 9300
PO Box 201, Queenstown 9348

p + 64 3 450 0700
maree.baker-galloway@al.nz | rosie.hill@al.nz

**anderson
lloyd.**

May it please the Commissioners

- 1 This Memorandum of Counsel is provided on behalf of Gertrude's Saddlery Limited and Larchmont Enterprises Limited (**Submitters**) in relation to the upcoming Arthurs Point renotification hearing scheduled for 1-3 February 2023 and in response to the Hearing Procedures and Directions dated 5 October 2022 (**Directions**).
- 2 In accordance with the Directions, material presented at the Hearing by any party (that is, material that has not been pre-circulated in accordance with the directions above) is limited to two A4 sheets of paper.
- 3 The Submitters' landscape expert, Mr Ben Espie, has prepared a succinct summary of his evidence to be tabled at the hearing but has been unable to keep this within the exact two-page limit. Accordingly, the Submitters respectfully seek leave for Mr Espie to pre-circulate a six page summary of his evidence.
- 4 It is submitted that there would be no prejudice to any party by providing the leave as sought, given:
 - (a) Mr Espie could talk to these issues orally in any event at the Hearing, however pre-circulation will allow the further submitters, other experts, and Commissioners to have greater transparency and understanding of the key issues which will be addressed;
 - (b) The information contained in the summary is central to the case and with the resolution of other evidential matters (such as Highly Productive Land and natural hazards) there should be ample time for consideration of these matters;
 - (c) The material in the summary is limited to just that – there is no new or different information being tabled.

Directions sought

- 5 The submitters respectfully seek that Mr Espie be allowed to pre-circulate the attached six page summary of his evidence in advance of the hearing.

Dated this 26th day of January 2023



Maree Baker-Galloway/Rosie Hill
Counsel for the Submitters