

**BEFORE THE HEARINGS PANEL  
FOR THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN**

**IN THE MATTER** of the Resource Management Act 1991  
**AND**  
**IN THE MATTER** of Hearings Stream 14: Wakatipu Basin

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**MEMORANDUM OF COUNSEL FOR TUCKER BEACH RESIDENTS**

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**Dated: 23 July 2018**

**TODD & WALKER law**  
LAWYERS | NOTARY PUBLIC

Solicitors:

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**MAY IT PLEASE THE PANEL:**

1. We act for Tucker Beach Residents (submitter #2802). Tucker Beach Residents filed a further submission on the Proposed District Plan opposing the submission of the Middleton Family Trust ("**Trust**").
2. We refer to the application made by the Trust in its counsel's legal submissions to the Panel dated 11 July 2018 for the Tucker Beach Residents submission to be struck out under s 41C of the Resource Management Act 1991.
3. We also refer to the subsequent minute of the Chair dated 13 July 2018 directing the Tucker Beach Residents to file and serve submissions in response to the Trust's application by Friday 20 July 2018.
4. Tucker Beach Residents and subsequently its counsel were only made aware of the minute of the Chair and application by the Trust on Sunday 22 July 2018. They were not served with or notified of the Trust's legal submissions or the minute of the Chair. This was confirmed to us by Ms Marson for the Council on 23 July 2018.
5. In light of such, and given counsel for Tucker Beach Residents' other commitments relating to the Proposed District Plan hearings as well as Environment Court matters counsel is involved in, we respectfully request an extension of time for Tucker Beach Residents to file and serve submissions in response to the Trust's application to **Monday 30 July 2018**.



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G M Todd/B B Gresson  
Counsel for Tucker Beach Residents