

Before Queenstown Lakes District Council

In the matter of The Resource Management Act 1991

And The Queenstown Lakes District proposed District Plan –
Rezoning Hearing Topic 12 – Upper Clutha mapping

MEMORANDUM OF COUNSEL FOR

Glendhu Bay Trustees Limited (#583)

Dated 19 April 2017

Solicitors:

Maree Baker-Galloway | Rosie Hill
Anderson Lloyd
Level 2, 13 Camp Street, Queenstown 9300
PO Box 201, Queenstown 9348
DX Box ZP95010 Queenstown
p + 64 3 450 0700 | f + 64 3 450 0799
maree.baker-galloway@al.nz | rosie.hill@al.nz

**anderson
lloyd.**

Introduction

- 1 This Memorandum of Counsel is written on behalf of the named submitter, Glendhu Bay Trustee Limited ("**Submitter**") in respect of the Upper Clutha Mapping Hearing, Stream 12 ("**Hearing**").
- 2 The Submitter has been allocated one full day for hearing time on Thursday 08 June 2017. The submitter will be represented by the following witnesses:

John Darby	Landowner evidence
John McRae	Landowner evidence
Andy Carr	Traffic
Ken Gousmett	Servicing
Brett Thomson	Master planning / design
Judith Roper-Lindsay	Biodiversity
Yvonne Pfluger	Landscape
Chris Ferguson	Planning

- 3 It has come to Counsel's attention that two of the above experts will not be available for the set hearing day on 08 June 2017, and accordingly leave is sought for these two witnesses to be scheduled for a separate hearing time within the Schedule.
- 4 Judith Roper-Lindsay and John McRae will be overseas between 06 June and 08 July 2017. Counsel has revised the Hearing timetable and these witnesses' availability, and notes the following gaps in the timetable which will work for both:
 - (a) Tuesday 23 May 3.50pm- 5pm
 - (b) Wed 31 May 4-5pm¹
- 5 Counsel considers that given evidence is pre-read, these two Submitters should not take longer than 40 minutes of hearing time together.

¹ The Submitter has conferred with Counsel for Allenby Farms Limited who has advised it will not require hearing time between 4-5pm.

- 6 Accordingly, Counsel respectfully requests that the Hearings Panel consider this request and confirm the witnesses may attend on the date preferred by the Hearings Panel.

Counsel for Glendhu Bay Trustee Limited

A handwritten signature in black ink, appearing to read "Rosie Hill", is written over a light grey rectangular background.

Rosie Hill