

Before Queenstown Lakes District Council
Registry

In the matter of the Resource Management Act 1991

And the Queenstown Lakes District proposed District Plan Topic 13
Queenstown Mapping

MEMORANDUM OF COUNSEL FOR

Jack's Point Residents and Owners Association (#756, and #1277)

Dated 21 August 2017

Appellant's solicitors:

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

**anderson
lloyd.**

MAY IT PLEASE THE PANEL

Introduction

- 1 This Memorandum of Counsel (**Memorandum**) is lodged on behalf of Jack's Point Residents and Owners Association (**JPROA**) in respect of Hearing Stream 13 Group 1D (Jacks Point Zone Extension).
- 2 JPROA lodged a further submission (#1277) on the submission from Jardine Family Trust and Remarkables Station Limited (#715) (**Submitter 715**) in respect of the proposal to rezone land at Homestead Bay within and adjacent to the notified Jacks Point Zone (**JPZ**).
- 3 This Memorandum addresses the Minute lodged by the Chair of the Panel on 15 August 2017 regarding additional information to be provided by Submitter 715 (**Minute**).
- 4 This Memorandum seeks a waiver of direction and an extension of time for JPROA to respond to any additional information provided by Submitter 715.

Request for an extension of time

- 5 The Minute seeks additional infrastructure information from Submitter 715 and requires the submitter to lodge any additional information by noon on Friday 1 September 2017. Any persons who lodged further submissions on submission 715 have until noon on Friday 8 September 2017 to respond to this additional material.
- 6 Mr Gousmett, JPROA's infrastructure expert, has pre-existing commitments during the period of 1 September 2017 to 8 September 2017 and will be unable to review the additional information provided, nor prepare comments on this material.
- 7 Therefore Counsel respectfully requests an extension of time for Mr Gousmett to file comments on any additional material provided by Submitter 715 to noon on 15 September 2017.
- 8 Please note that all other JPROA witnesses (Mike Coburn, Andy Carr and Chris Ferguson) can comply with the timetable as directed, being noon on 8 September 2017.

Dated this 21st day of August 2017

A handwritten signature in blue ink that reads "Maree Baker-Galloway". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Maree Baker-Galloway/Rosie Hill
Counsel for the Appellant