

Under the Resource Management Act 1991 (**RMA**)  
In the matter of Priority Area Landscape Schedules Variation to the  
Queenstown Lakes Proposed District Plan

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**Memorandum of counsel in respect of Mr Farrell's evidence in chief**

11 September 2023

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**Submitters' solicitors:**

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**anderson  
lloyd.**

**May it please the Panel**

- 1 This memorandum of counsel is provided in respect of the timing of Mr Farrell's evidence in chief.
- 2 We respectfully seek leave to file Mr Farrell's evidence in chief by 5pm Wednesday 13 September.
- 3 Despite best endeavours, Mr Farrell has not completed his evidence in chief.
- 4 In the week leading up to today's deadline, Mr Farrell, in his role as President of the Resource Management Law Association, had been fully committed to hosting the RMLA's annual conference, in Queenstown from 6 – 8 September. Mr Farrell's duties as President, including hosting the Judiciary who attended, had to take priority.
- 5 Accordingly, he has prepared the attached summary so that his key points are made and avoid any issues with regards to prejudice.
- 6 Leave is sought to lodge full evidence in chief 5pm Wednesday 13 September. This still provides more than 2 weeks for the preparation of Council's witnesses rebuttal.

Dated this 11<sup>th</sup> day of September 2023

*Maree Baker-Galloway*

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