

**BEFORE THE INDEPENDENT HEARINGS  
PANEL**

**IN THE MATTER** of the Resource Management Act 1991 (the **Act**)

**AND**

**IN THE MATTER** of the Variation to the Priority Area Landscape Schedules  
(**Variation**) to the Queenstown Lakes District Council  
Proposed District Plan (**PDP**)

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**MEMORANDUM OF COUNSEL ON BEHALF OF QUEENSTOWN PARK LIMITED**

**Dated: 12<sup>th</sup> September 2023**

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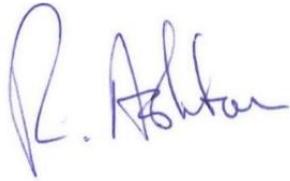
Rowan Ashton  
Senior Associate  
ashton@brookfields.co.nz  
Telephone No. 09 979 2210  
P O Box 240  
DX CP24134  
**AUCKLAND**

**BROOKFIELDS**  
LAWYERS

**MAY IT PLEASE THE PANEL:**

1. The Panel's directions provide for submitter expert evidence to be lodged by 11 September 2023.
2. The evidence of Mr Brown on behalf of Queenstown Park Limited has been lodged one day late due to the workloads and commitments of the witness and counsel.
3. An extension to the timetable for lodgement of this evidence is respectfully sought. It is submitted that no undue prejudice arises from the one day of lateness of this evidence.

**DATED:** 12 September 2023



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**R Ashton**  
Counsel for Queenstown Park Limited