

Before the RPS Hearing Panel

In the matter of Submissions on the Proposed Otago Regional Policy
Statement 2021 (excluding parts determined to be a freshwater
planning instrument)

**Memorandum of Counsel on behalf of Mt Cardrona Station Village Limited (0114),
Darby Asset Management LP and others (FS00607) and Maryhill Limited (0118)**

10 December 2022

Solicitors:

Maree Baker-Galloway | Rosie Hill
Anderson Lloyd
Level 2, 13 Camp Street, Queenstown 9300
PO Box 201, Queenstown 9348

p + 64 3 450 0700
maree.baker-galloway@al.nz | rosie.hill@al.nz

**anderson
lloyd.**

May it please the Panel

- 1 This Memorandum of Counsel is filed on behalf of on behalf of Mt Cardrona Station Village Limited (0114), Darby Asset Management LP and others (FS00607) and Maryhill Limited (0118) (collectively, the **Submitters**) in response to Minute 1 of the Hearing Commissioners dated 3 October 2022 (**Minute**) and the Notice of Hearing dated 30 November 2022 (**Notice**).
- 2 The Submitters have an interest in, and wish to be heard in relation to, the following topics:
 - (a) Integrated Management;
 - (b) Urban Form and Development;
 - (c) Energy, Infrastructure & Transport;
 - (d) Land & Freshwater; and
 - (e) Natural Features and Landscapes.
- 3 The Submitters do not consider it is sustainable or efficient to travel to and from Dunedin on multiple dates to be heard in respect of different submission points allocated to different topics, when their evidence addresses these topics on a holistic and integrated basis. Accordingly, they respectfully seek that they be allowed to be heard in one sitting during the week of 1 – 5 May 2023. Any time during this week is acceptable.
- 4 For the avoidance of doubt, two hours will be sufficient for the Submitters to present legal submissions and expert evidence. This complies with the prescribed times in the Minute and the Notice (being 30 minutes per Submitter and an additional 15 minutes for each expert witness).

Directions sought

- 5 The Submitters respectfully seek they be allowed to appear in support of all of their submission points in one sitting in the week of **1 – 5 May 2023**.

Dated this 10th day of December 2022



Maree Baker-Galloway/Rosie Hill
Counsel for the Submitters