

**BEFORE THE OTAGO REGIONAL COUNCIL**

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

**AND**

**IN THE MATTER** of the Proposed Otago Regional Policy Statement 2021

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**MEMORANDUM OF COUNSEL ON BEHALF OF QUEENSTOWN LAKES  
DISTRICT COUNCIL (138)**

**28 MARCH 2023**

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PO Box 323 QUEENSTOWN 9348  
Tel +64 3 379 7622  
Fax +64 3 379 2467

**WYNN WILLIAMS**

Solicitor: Alice Balme / Jake Robertson  
([alice.balme@wynnwilliams.co.nz](mailto:alice.balme@wynnwilliams.co.nz))  
([jake.robertson@wynnwilliams.co.nz](mailto:jake.robertson@wynnwilliams.co.nz))

**MAY IT PLEASE THE PANEL:**

- 1 This memorandum is filed on behalf of the Queenstown Lakes District Council (**QLDC**) in relation to the hearing schedule for the Natural Features and Landscapes (**NFL**) topic (hearing week 8).
- 2 In accordance with the hearing week 8 schedule, Sarah Picard is scheduled to present NFL evidence on behalf of QLDC on 1 May 2023. Sarah Picard is currently on extended sick leave and will not be returning to work until 15 May 2023 at the earliest. Therefore, she is unavailable to present her evidence as scheduled.
- 3 Accordingly, QLDC respectfully requests that Sarah Picard's evidence is taken as read. If the Panel has questions in relation to this evidence or QLDC's submission on the NFL provisions, QLDC requests that the Panel provide these questions in writing, and that QLDC files a written response.
- 4 Alternatively, if the Panel has questions it would prefer to ask at the hearing, QLDC can make another expert available.

**Direction sought**

- 5 QLDC respectfully seeks the following direction:
  - (a) Sarah Picard's statement of evidence on Natural Features and Landscapes dated 23 November 2022 is taken as read.

Dated this 28<sup>th</sup> day of March 2023



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K H Woods / J G Robertson

**Counsel for Queenstown Lakes District Council**