

IN THE MATTER

of an appeal under clause 14(1) of
The First Schedule to the Resource
Management Act 1991

BETWEEN

**HOMESTEAD BAY TRUSTEES LTD
AND REMARKABLES STATION
LTD, DICKSON STEWART JARDINE,
JILLIAN FRANCES JARDINE,
DICKSON STEWART JARDINE AND
HGW TRUSTEES LIMITED, JILLIAN
FRANCES JARDINE AND HGW
TRUSTEES LIMITED**

Appellant

AND

**QUEENSTOWN LAKES DISTRICT
COUNCIL**

Respondent

MEMORANDUM OF COUNSEL

24 August 2023

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MAY IT PLEASE THE COURT:

1. This Memorandum is on behalf of Homestead Bay Trustees Limited (**HBTL**) and Remarkables Station Limited, Dickson Stewart Jardine, Jillian Frances Jardine, Dickson Stewart Jardine and HGW Trustees Limited, Jillian Frances Jardine and HGW Trustees Limited (**RSL**) and is further to the matters set out in counsel for HBTL's Memorandum of 16 August 2023 and RSL's Memorandum of 17 August 2023.
2. HBTL and RSL are concerned for the integrated development of their lands within the Jacks Point Zone. Their primary concern is for sensible urban design and utilisation of the HBTL and RSL land as part of the inevitable urbanisation of the Southern Corridor.
3. Both Area D and Area E (as described in the proposed Structure Plan attached to the Notices of Appeal) that sit within the HBTL and RSL land are now identified within a new urban growth area in the Council's 2021 Spatial Plan for integrated urban development in the area to be known as the Southern Corridor. The Southern Corridor has been identified as a Priority Development Area and a Structure Planning exercise is underway for the area. It is understood that this planning is to inform the Council's Future Development Strategy when it is prepared in 2024 as required by the National Policy Statement – Urban Development 2020.
4. This is a significantly different urbanisation proposition to that anticipated at the time of the appeals being filed on the Proposed District Plan. Given the wider urban design benefits from integrated comprehensive residential development, and Council's commitment to its Future Development Strategy, HBTL and RSL now see little point in pursuing their appeals seeking medium density improvements. It is understood that assessment and workshopping carried out by Council, the appellants, and section 274 parties in late 2021 is informing the Structure Planning exercise.
5. Counsel for HBTL and RSL confirm that the two appeals are withdrawn in their entirety.



I M Gordon

Counsel for Homestead Bay Trustees Limited
24 August 2023



Joshua Leckie

Counsel for Remarkables Station Limited
and Jardine
24 August 2023