

**BEFORE THE COMMISSIONERS APPOINTED ON BEHALF
OF THE OTAGO REGIONAL COUNCIL, CENTRAL OTAGO DISTRICT
COUNCIL and QUEENSTOWN LAKES DISTRICT COUNCIL**

Under The Resource Management Act 1991
(the **Act**)

In the Matter Application for Resource Consent to
undertake Gold Dredging

Between **COLD GOLD CLUTHA LIMITED**
Applicant

AND **OTAGO REGIONAL COUNCIL**
(RM22.434)
Regional Council
QUEENSTOWN LAKES DISTRICT
COUNCIL (RM220834) AND
CENTRAL OTAGO DISTRICT
COUNCIL (RC220255)
District Councils

**MEMORANDUM OF COUNSEL ON BEHALF OF THE APPLICANT
REGARDING LANDSCAPE ASSESSMENT**

DATED 10 OCTOBER 2023



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MEMORANDUM OF COUNSEL ON BEHALF OF THE APPLICANT**May it please the Commissioners:**

1. Counsel refers to Minute 2 dated 4th October 2023.
2. Counsel has recently been instructed to assist the Applicant with this hearing.
3. In light of the section 42A report the Applicant has engaged an independent expert witness to provide a landscape assessment as part of its evidence. We would like to respectfully request that the Commission await the filing of this evidence before determining whether it is necessary to commission its own report regarding landscape matters.
4. Counsel can advise that Minute 2 has been provided to the witness to ensure that the assessment is carried out in accordance with Te Tangi a te Manu Aotearoa New Zealand Landscape Assessment Guideline.

Dated 10 October 2023

A handwritten signature in blue ink, appearing to read "Bridget Irving". The signature is written in a cursive, flowing style.

Bridget Irving / Hannah Perkin

Counsel for Cold Gold Clutha Limited