

**IN THE ENVIRONMENT COURT  
AT CHRISTCHURCH**

ENV-2020-CHC-128

**I TE KŌTI TAIAO  
KI ŌTAUTAHI**

**UNDER** the Resource Management Act 1991

**IN THE MATTER** of a a notice of motion under section  
149T(2) of the Act

**BY** **OTAGO REGIONAL COUNCIL**

Applicant

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**JOINT MEMORANDUM OF COUNSEL ON BEHALF OF WILLOWRIDGE  
DEVELOPMENTS LIMITED AND REMARKABLES PARK LIMITED**

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Dated: 17 December 2021

**TODD & WALKER** law  
LAWYERS | NOTARY PUBLIC

**Solicitor acting**  
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**MAY IT PLEASE THE COURT:**

[1] This memorandum is in response to paragraph [12](a)(ii) of the Court's minute of 14 December 2021 whereby parties who attended mediation were directed to advise of the witnesses they intend to call.


[2] Willowridge Developments Limited and Remarkables Park Limited intend to call the following witnesses:

- (a) Claire Hunter (planning); and
- (b) Quinn McEntyre (environmental consultant).

Dated: 17 December 2021



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B B Gresson  
Counsel for Willowridge Developments Limited



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R Ashton  
Counsel for Remarkables Park Limited