

**BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL**

**IN THE MATTER OF**

the Resource Management Act 1991

**AND**

**IN THE MATTER OF**

of proposed Private Plan Change 51  
to the Queenstown Lakes District  
Plan

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**MEMORANDUM OF COUNSEL FOR  
PENINSULA BAY JOINT VENTURE LIMITED**

Dated: 27 July 2016

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**GREENWOOD ROCHE**  
LAWYERS  
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**MAY IT PLEASE THE COMMISSIONERS:**

- 1 The hearing of Plan Change 51 is scheduled to commence at 10am on Monday 8 August 2016.
- 2 The Commissioners have directed that:
  - (a) Pursuant to section 42A RMA, that the section 42A RMA report be circulated by the Council to the parties by 5pm on **Friday 22 July 2016.**
  - (b) Pursuant to section 41B (1) and (2) RMA, that the applicant provides a written brief of all its expert evidence to the Council by 5pm on **Friday 29 July 2015.**
  - (c) Pursuant to section 41B(3) and (4) RMA, that if any person who has made a submission intends to call expert evidence at the hearing then that party is to provide a written brief of that evidence to the Council by 12 noon **Friday 5 August 2016.**
- 3 The applicant and its witnesses have undertaken a detailed review of the Council's section 42A report. Having undertaken that review, the applicant is making some amendments to the plan change to address issues raised in the Officer's report. This requires amendments (within scope) to several of the plans which are integral to the plan change (including the Concept Development Plan, Structure Plan, the Indicative Earthworks Plan and the Landscape Concept Plan). A further, new plan is also being prepared which shows the location of a number of the tracks and trails referred to in the evidence, a matter which appears to be creating some confusion.
- 4 It is respectfully submitted that it will aid both the Commissioners and submitters if these amended plans accompany the evidence when it is lodged rather than tabling these plans at the hearing.
- 5 Although the witnesses are working assiduously it is unlikely that the necessary plan amendments will be able to be completed by 5pm this Friday. Therefore the requestor seeks an extension of the time for lodging the applicant's evidence to 5pm on Monday 1 August.
- 6 The Commissioners may wish to make consequential amendments to the balance of the timetable to account for the above extension if

granted. The applicant will abide the decision of the Commissioners in that regard.



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L J Semple / M A Thomas

Counsel for Peninsula Bay Joint Venture Limited

27 July 2016