

**BEFORE THE HEARINGS PANEL
FOR THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN**

IN THE MATTER of the Resource
Management
Act 1991

AND

IN THE MATTER of Hearing Stream 12
– Upper Clutha
Mapping

**MEMORANDUM OF COUNSEL FOR QUEENSTOWN LAKES DISTRICT
COUNCIL CONFIRMING REPLACEMENT PLANNING WITNESS / S42A
AUTHOR FOR GROUP 1B WANAKA – BUSINESS**

5 May 2017

 **Simpson Grierson**
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MAY IT PLEASE THE PANEL:

1. INTRODUCTION

- 1.1** This memorandum is filed on behalf of the Queenstown Lakes District Council (**Council**), alongside its rebuttal evidence for the Upper Clutha hearing.
- 1.2** The purpose of this memorandum is to advise the Panel that due to personal reasons Ms Amy Bowbyes is unavailable to appear as the Council's planning witness in the Upper Clutha hearing. Consequently Ms Vicki Jones has taken over this role and has prepared the rebuttal evidence that relates to Group 1B Wanaka – Business.
- 1.3** Ms Jones has read Ms Bowbyes' evidence / section 42A report (**Business s42A Report**) and confirms in her rebuttal evidence, that she agrees with its content and recommendations, and adopts it as her own for the purpose of this hearing.

2. GROUP 1B URBAN BUSINESS SECTION 42A REPORT

- 2.1** Since filing the Business s42A Report of Ms Amy Bowbyes, Ms Bowbyes has had to take leave to care for her son who is recovering from an operation. She will not be back at work until 16 May 2017. Unfortunately, this means Ms Bowbyes is unavailable to prepare rebuttal evidence to be filed on 5 May 2017. She is also unavailable to prepare for the Upper Clutha hearing that starts on Monday 15 May 2017.
- 2.2** Therefore the Council has instructed Ms Jones in relation to the rezoning submissions that fall within Group 1B Wanaka – Business.
- 2.3** Ms Jones is suitably qualified to adopt Ms Bowbyes' evidence. She is a private consultant contracted by the Council, and has been involved in various hearings in Stage 1, including in particular in her role as reporting officer for the Queenstown Town Centre and Wanaka Town Centre Zones in the Business Hearing Stream.

2.4 Consequently, the Council respectfully advises the Panel that Ms Jones will be the substitute planning witness for Ms Bowbyes. A replacement Business s42A Report of Ms Jones, which sets out her qualifications and experience, and confirms that Ms Jones adopts the evidence of Ms Bowbyes as already filed, in accordance with the Code of Conduct, is filed alongside this memorandum.

DATED this 5th day of May 2017

A handwritten signature in blue ink, appearing to read 'C J McCallum', is positioned above a horizontal line.

S J Scott / C J McCallum
Counsel for Queenstown Lakes District Council