

**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  
Annotations and  
Rezoning Requests

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**MEMORANDUM OF COUNSEL ON BEHALF OF THE QUEENSTOWN LAKES  
DISTRICT COUNCIL REQUESTING EXTENSION TO FILE THE DWELLING  
CAPACITY MODEL EVIDENCE**

**28 April 2017**

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## MAY IT PLEASE THE PANEL

1. This memorandum is filed on behalf of Queenstown Lakes District Council (**Council**) in relation to dwelling capacity model (**DCM**) evidence due to be filed at 1pm today.
2. The Council anticipates filing the following:
  - 2.1 Statement of Evidence of Philip Osborne (dwelling capacity); and
  - 2.2 Supplementary Statement of Evidence of Craig Barr (supplementary planning).
3. Originally the DCM evidence was to be filed alongside the Council's section 42 reports and expert evidence on 21 March 2017. In response to a request by the Council the Hearings Panel (**Panel**) granted an extension for filing until 1pm 28 April 2017,<sup>1</sup> which was the original date for the Council's rebuttal evidence to be filed. The Council's rebuttal evidence is now due to be filed by 1 pm 5 May 2017.<sup>2</sup>
4. Despite the Council's best efforts the work required to deliver the DCM evidence, specifically that of Mr Osborne, has taken longer than anticipated to develop and finalise. This is due in part to the Easter break and ANZAC day holiday, which compressed the workload of Mr Osborne (who worked through these holidays in any event) and who has other commitments. The delay also relates to the sheer level of work required to update the DCM. The Council wishes to ensure that the evidence finally put to the Panel, and submitters, is robust and not rushed through at the last minute.
5. In order to achieve this the Council respectfully requests a short extension until midday Monday, 1 May 2017. This will ensure the robustness of Mr Osborne's evidence and allow Mr Barr's supplementary planning evidence to provide useful and clear recommendations to the Panel.
6. There is considered to be little to no prejudice to submitters as it is only a delay of one working day. However, to ensure no prejudice occurs the Council

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1 Minute concerning application for variation of Stream 12 Hearing directions by QLDC dated 6 March 2017, at page 2.

2 Eighth Procedural Minute updating Arrangements for Upper Clutha Mapping hearings dated 28 March 2017, at paragraph 8(6).

would not object to the Panel also granting an extension for submitters to file rebuttal evidence on Mr Osborne and Mr Barr's evidence to 1pm 9 May 2017 (previously 8 May 2017).

7. The Council therefore respectfully requests that the Panel grant an extension for the Council to file its DCM evidence, specifically evidence from Mr Osborne and supplementary evidence from Mr Barr, by 1pm on Monday, 1 May 2017.

**DATED** this 28<sup>th</sup> day of April 2017



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S J Scott  
Counsel for Queenstown Lakes District  
Council