

**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 02 –  
Rural, Rural Residential  
and Lifestyle, Gibbston  
Character Zone,  
Indigenous Vegetation  
and Biodiversity, and  
Wilding Exotic Trees

---

**MEMORANDUM OF COUNSEL FOR QUEENSTOWN LAKES DISTRICT COUNCIL  
REGARDING OPENING ON 2 MAY 2016**

**HEARING STREAM 02 – RURAL**

**19 APRIL 2016**

---

---

 **Simpson Grierson**  
Barristers & Solicitors

J G A Winchester / S J Scott  
Telephone: +64-3-968 4018  
Facsimile: +64-3-379 5023  
Email: sarah.scott@simpsongrierson.com  
PO Box 874  
SOLICITORS  
CHRISTCHURCH 8140

## MAY IT PLEASE THE PANEL:

1. The purpose of this memorandum is to request that the Hearing Panel allocate Monday 2 May (PM) through to Wednesday 4 May to the Queenstown Lakes District Council (**Council**), for its opening and presentation of reports and evidence on the Rural Chapter.
2. The Rural hearing is made up of five chapters of the proposed District Plan (**PDP**), being the Rural, Rural Residential and Lifestyle, Gibbston Character Zone, Indigenous Vegetation and Biodiversity, and Wilding Exotic Trees chapters.
3. The Council respectfully considers that additional time to present its opening is required for the following reasons:
  - 3.1 to allow the Council to present a full case explaining the approach taken by the Council and its position on the Rural chapters of the PDP;
  - 3.2 the Council is responding to, and providing a position on, all submission points, as opposed to presenting a case on one particular issue or site. The breadth and scope of the information that it seeks to present to the Panel is therefore wider, than for specific submitters; and
  - 3.3 the Council has taken into account the time required to present its opening in the Strategic Direction hearing, in seeking 2.5 days to present its case.
4. In order to assist the Panel, the Council has proposed in **Schedule 1** estimated timing for questioning from the Panel based on the extent of issues covered by the respective Council officer and expert(s), and taking guidance from the Fourth Procedural Minute.<sup>1</sup>

---

<sup>1</sup> Fourth Procedural Minute dated 8 April 2016, at paragraph 15.

5. Counsel notes that Mr Phillip Osborne has advised that he is only available to present his evidence on Wednesday, 4 May 2016, as he is presenting evidence in the Environment Court in Hamilton on 2 – 3 May. The proposed order in Schedule 1 takes that availability into account.

**DATED** this 19<sup>th</sup> day of April 2016



---

J G A Winchester/S J Scott  
Counsel for Queenstown Lakes District  
Council

### Schedule 1

<b>James Winchester / Sarah Scott</b>	Opening Legal Submissions	2 hours
<b>Stephen Chiles</b>	Noise – Informal Airports evidence – highlights summary	30 minutes
<b>Marion Read</b>	Landscape evidence – highlights summary	1 hour 15 minutes
<b>Craig Barr</b>	Rural, Rural Residential and Lifestyle, Gibbston Character Zone chapters, Officer's report – highlights summary	5 hours 45 minutes
<b>Glenn Davis</b>	Ecologist evidence – highlights summary	1 hour
<b>Craig Barr</b>	Indigenous Vegetation and Biodiversity, and Wilding Exotic Trees chapters, Officer's report – highlights summary	4 hours
<b>Phillip Osborne</b>	Economics evidence – highlights summary	1 hour