

**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 4
– Subdivision and
Development

**MEMORANDUM OF COUNSEL FOR QUEENSTOWN LAKES DISTRICT
COUNCIL REQUESTING EXTENTION TO FILE RIGHT OF REPLY**

HEARING STREAM 04 – SUBDIVISION AND DEVELOPMENT

22 August 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. This memorandum is filed on behalf of the Queenstown Lakes District Council (**Council**). The purpose of this memorandum is to seek an extension to the deadline for filing the Council's Right of Reply¹ in respect of Hearing Stream 4 – Subdivision and Development.
2. Hearing Stream 4 – Subdivision and Development finished on Wednesday, 17 August 2016 and the Council's Right of Reply is currently due to be filed on Wednesday, 24 August 2016.
3. At the hearing, the Panel requested that Mr Nigel Bryce (the Council's lead planning witness) prepare a suite of assessment matters that would accompany both the controlled and restricted discretionary rule framework in Chapter 27. Mr Bryce will be recommending that these assessment matters form part of his revised provisions and has sought to integrate these into his amended provisions for Chapter 27. This work is a significant undertaking and has taken up some of the limited time the Council has to prepare its Right of Reply.
4. In addition, Mr Bryce was ill at the end of last week and over the weekend. He also has evidence due in the Environment Court on Friday, 26 August 2016 and is currently managing the two workloads.
5. Counsel has also contacted the District Plan Administrator who has advised that granting an extension would not cause any logistical issues from her perspective.
6. Accordingly, the Council respectfully seeks leave for an extension to the filing of its Right of Reply (both Legal Submissions and Mr Bryce's Reply Evidence) to 3pm Friday, 26 August 2016.

DATED this 22nd day of August 2016



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

1 The Council's Right of Reply includes Legal Submissions and Reply Evidence of Mr Nigel Bryce.