

**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 05
– District Wide

**MEMORANDUM OF COUNSEL FOR QUEENSTOWN LAKES DISTRICT
COUNCIL REGARDING OPENING ON 12 SEPTEMBER 2016**

HEARING STREAM 05 – DISTRICT WIDE

30 August 2016

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MAY IT PLEASE THE PANEL:

1. The purpose of this memorandum is to request that the Hearing Panel allocate one full day on Monday 12 September 2016 to the Queenstown Lakes District Council (**Council**), for its opening and presentation of legal submissions, reports and evidence on the District Wide hearing.
2. The District Wide hearing is made up of three chapters of the proposed District Plan (**PDP**), being the Energy and Utilities, Temporary Activities and Relocated Buildings, and Noise chapters.
3. The Council has filed a section 42A report for all three chapters, and will also be presenting expert acoustics evidence from Dr Stephen Chiles.
4. The Council respectfully considers that additional time to present its opening is required for the following reasons:
 - 4.1 to allow the Council to present a full case explaining the approach taken by the Council and its position on the Energy and Utilities, Temporary Activities and Relocated Buildings, and Noise chapters of the PDP;
 - 4.2 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;
 - 4.3 for the foregoing reason, the breadth and scope of the information that it seeks to present to the Panel is therefore wider than for specific submitters; and
 - 4.4 the Council has taken into account the time required to present its opening in the preceding hearings, in seeking one full day to present its case.
5. 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(s) and expert, and taking guidance from the Fourth Procedural Minute.¹

DATED this 30th day of August 2016



S J Scott / K L Hockly
Counsel for Queenstown Lakes District Council

¹ Fourth Procedural Minute dated 8 April 2016, at paragraph 15.

SCHEDULE 1

Sarah Scott	Opening Legal Submissions	45 minutes
Stephen Chiles	Acoustics evidence – highlights summary and Panel questions	45 minutes
Ruth Evans	Noise, Officers report – highlights summary and Panel questions	1 hour 15 minutes
Craig Barr	Energy and Utilities, Officer's report – highlights summary and Panel questions	1 hour 30 minutes
Kimberley Banks	Temporary Activities and Relocated Buildings, Officer's report – highlights summary and Panel questions	1 hour