

**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 06
– Residential

**MEMORANDUM OF COUNSEL FOR QUEENSTOWN LAKES DISTRICT
COUNCIL REGARDING OPENING ON 10 OCTOBER 2016**

HEARING STREAM 06 – RESIDENTIAL

26 September 2016

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MAY IT PLEASE THE PANEL:

1. The purpose of this memorandum is to request that the Hearing Panel allocate two full days on Monday 10 October and Tuesday 11 October 2016 to the Queenstown Lakes District Council (**Council**), for its opening and presentation of legal submissions, reports and evidence on the Residential hearing.
2. The Residential hearing is made up of five chapters of the proposed District Plan (**PDP**), being the Low Density Residential, Medium Density Residential, High Density Residential, Arrowtown Residential Historic Management Zone, and Large Lot Residential chapters.
3. The Council has filed a section 42A report for all five chapters, and will also be presenting expert evidence from the following witnesses:
 - 3.1 Mr Ulrich Glasner, in relation to infrastructure;
 - 3.2 Dr Stephen Chiles, in relation to acoustics;
 - 3.3 Mr Philip Osborne, in relation to economics; and
 - 3.4 Mr Garth Falconer, in relation to urban design.
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 Low Density Residential, Medium Density Residential, High Density Residential, Arrowtown Residential Historic Management Zone, and Large Lot Residential 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 two full days 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 experts, and taking guidance from the Fourth Procedural Minute.¹

DATED this 26th day of September 2016



S J Scott / H L Baillie
Counsel for Queenstown Lakes District Council

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

SCHEDULE 1

Day One – Monday 10 October 2016		
Sarah Scott	Opening Legal Submissions	45 minutes
Ulrich Glasner	Infrastructure evidence – highlights summary and Panel questions	45 minutes
Stephen Chiles	Acoustics evidence – highlights summary and Panel questions	45 minutes
Philip Osborne	Economics evidence – highlights summary and Panel questions	45 minutes
Garth Falconer	Urban design evidence – highlights summary and Panel questions	45 minutes
Amanda Leith	Low Density Residential, Officers report – highlights summary and Panel questions	1 hour 15 minutes
Day Two – Tuesday 11 October 2016		
Amanda Leith	Medium Density Residential, Officers report – highlights summary and Panel questions	1 hour 30 minutes
Kimberley Banks	High Density Residential, Officers report – highlights summary and Panel questions	1 hour 30 minutes
Rachael Law	Arrowtown Residential Historic Management Zone, Officers report – highlights summary and Panel questions	45 minutes
Amanda Leith	Large Lot Residential, Officers report – highlights summary and Panel questions	1 hour 15 minutes