

**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 6A –
Variation 1, Arrowtown
Design Guidelines

**MEMORANDUM OF COUNSEL ON BEHALF OF THE QUEENSTOWN LAKES
DISTRICT COUNCIL**

27 October 2016

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MAY IT PLEASE THE PANEL

1. This memorandum is filed on behalf of Queenstown Lakes District Council (**Council**) and has two purposes:
 - (a) to provide the Hearing Panel (**Panel**) and submitters with an updated Town Centre Figure 1 – Part 1 and Part 2 (**Updated Figures**) in the Arrowtown Design Guidelines 2016 (**ADG 2016**); and
 - (b) to identify the two submitters who submitted on the Proposed District Plan (**PDP**) Residential chapters, who the Council considers should be invited to the Variation 1 hearing beginning on 7 November 2016.

ADG – Updated Figures

2. Following the filing of the Variation 1 s42A report on 12 October 2016, further work has been completed to update the Town Centre Figure 1 – Part 1 and Part 2 in the ADG 2016.¹ This work was unable to be completed before filing the s42A report due to time constraints and the availability of Mr Knott (the Council's witness) who has provided technical input.
3. In order to provide submitters with an opportunity to formally consider the Updated Figures, these are attached at **Appendix 1**.
4. Mr Nigel Bryce supports the **Appendix 1** version of the Updated Figures, and will formally confirm this when he presents his summary of evidence at the hearing on 7 November 2016. The Updated Figures replace those located on pages 68 to 71 of the ADG 2016 in Appendix 2 of Mr Bryce's s42A report.

Submitters on Stage 1 provisions

5. Clause 16B of Schedule 1 of the Resource Management Act 1991 provides that any submissions made on the Proposed District Plan provisions that were replaced by Variation 1 (i.e. the references to the 2006 Arrowtown Design Guidelines) shall be deemed to be a submission against the variation.

1 See pages 68 to 71 of the ADG 2016.

6. Mark Kramer (268) and Reddy Group Limited (699) both submitted on Chapter 8 Medium Density Residential and their submissions relate to the Arrowtown Design Guidelines 2006.
7. As the submissions of Mr Kramer and Reddy Group were on the 2006 Arrowtown Design Guidelines, those parts of their submissions are deemed to be a submission against Variation 1. They were not however addressed in Mr Bryce's s42A report (although they were addressed in Appendix 2 to the s42A report for Chapter 8 – Medium Density Residential and were recommended to be accepted).²
8. These two submitters should have been considered in the Variation 1 s42A report, and the submitters invited to the hearing and given an opportunity to be heard on their original submission. Counsel has therefore asked Council staff to invite these two submitters to the hearing.

DATED this 27th day of October 2016



S J Scott / C J McCallum
Counsel for Queenstown Lakes District
Council

² See page 16 of Appendix 2 to s42A Report for Chapter 8 - Medium Density Residential dated 14 September 2016.

APPENDIX 1
UPDATED FIGURES

