IN THE MATTER

of the Resource Management

Act 1991

AND

IN THE MATTER

of the Queenstown Lakes Proposed District Plan

AND

**IN THE MATTER** 

of Hearing Stream 2: Rural

and Resort Zones

## MEMORANDUM OF COUNSEL FOR MILLBROOK COUNTRY CLUB LIMITED – SUBMITTER NO. 696

20 January 2017

Solicitor acting:

Andrew Stewart Morrison Kent PO Box 10035 Wellington 6011 Tel: 04 495 8921 Fax: 04 472 7017

Email: andrew.stewart@morrisonkent.com

Counsel acting:

I M Gordon Stout Street Chambers PO Box 117 Wellington

Tel: 04 472 9026 Fax: 04 472 9029

Email: ian.gordon@stoutstreet.co.nz

## May it please the Panel:

- This Memorandum of Counsel is provided on behalf of Millbrook Country Club Limited, a submitter (#696) in support of the PDP Millbrook Resort Zone provisions and in response to the Notice of Hearing issued today.
- The Panel has confirmed that a hearing in respect of Resort Zone issues will commence on 14 February 2017 and has requested that any requests in relation to hearing time be lodged from today.
- 3. Millbrook has undertaken a preliminary review of the s 42A report and supporting documentation received today.
- 4. One of Millbrook's expert witnesses is not available after 14 February.
- 5. In the circumstances, and in order to achieve a more seamless and efficient hearing, Millbrook respectfully requests that hearing of issues in respect of the Millbrook Resort Zone commence on the afternoon of 14 14 February with scope to carry the Planning witness over to 15 February if need be.
- 6. As to the allocation of time to witnesses, Millbrook intends to call the following and counsel anticipates that they will require the time indicated:
  - Mr Ben O'Malley Manager 5 minutes;
  - Mr Steve Skelton Landscape Expert 5 minutes;
  - Mr Andrew Craig Landscape Expert (Peer Review) 30 minutes;
  - Mr Dan Wells Resource Management Planner 15 minutes.

Together with additional time for questions from the Panel, approximately 70 minutes is anticipated for the evidence.

7. Counsel's legal submissions should take no longer than 20 minutes, subject to matters raised by witnesses for submitters in pre-circulated evidence or submissions.

8. On this basis, and taking into account the need for 2 of the Millbrook team to travel to Queenstown from elsewhere in New Zealand, a start time of 3pm on 14 February would be an efficient and convenient way to cater for the Millbrook case.

Ian Gordon

Counsel for Millbrook Country Club Limited

20 January 2017