

**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  
14 – Wakatipu  
Basin

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**MEMORANDUM OF COUNSEL FOR QUEENSTOWN LAKES  
DISTRICT COUNCIL REGARDING HEARING TIME FOR COUNCIL'S  
CASE**

**HEARING STREAM 14 – WAKATIPU BASIN**

**29 June 2018**

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 **Simpson Grierson**  
Barristers & Solicitors

S J Scott / C J McCallum  
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. The purpose of this memorandum is to request that three days is allocated to the Queenstown Lakes District Council (**Council**), for its opening and presentation of legal submissions (to be filed in advance), reports and evidence for the Wakatipu Basin chapter of the Proposed District Plan (**PDP**), and rezoning submissions located in the Wakatipu Basin, Ladies Mile and at Arrowtown.
  
2. Further to discussions with Council administration staff, the Council also respectfully requests that Ms Bridget Gilbert appears to present her evidence on Wednesday, 25 July 2018. The reason for this is Ms Gilbert is travelling internationally from 5-23 July 2018.
  
3. The Council has filed the following evidence in support of its recommendations on submissions:
  - (a) Craig Barr (Planning – Chapter 24 Wakatipu Basin text);
  - (b) Marcus Langman (Planning – Wakatipu Basin rezonings);
  - (c) Anita Vanstone (Planning – Ladies Mile (Stage 1) rezonings);
  - (d) Luke Place (Planning – Arrowtown Urban rezonings);
  - (e) Bridget Gilbert (landscape);
  - (f) Helen Mellsop (landscape);
  - (g) Andrea Jarvis (infrastructure);
  - (h) Vaughn Crowther (infrastructure).
  - (i) David Smith (traffic); and
  - (j) Glenn Davis (ecology).
  
4. The suggested order of the Council's case is:
  - (a) Legal Submissions (to be filed in advance);
  - (b) Counsel to read out Ms Gilbert's summary of evidence, which will be filed prior to the hearing;

*Wakatipu Basin (text)*

  - (c) Craig Barr;

*Wakatipu Basin (rezonings)*

- (d) Glen Davis;
- (e) Dave Smith;
- (f) Vaughn Crowther;
- (g) As a 'panel' of witnesses: Helen Mellsop, Andrea Jarvis and Marcus Langman together working through rezonings;

*Lake Hayes/Ladies Mike*

- (h) As a 'panel' of witnesses: Helen Mellsop, Andrea Jarvis and Anita Vanstone;

*Arrowtown*

- (i) As a 'panel': Helen Mellsop, Andrea Jarvis and Luke Place; and of witnesses

*Wednesday 25<sup>th</sup>*

- (j) Bridget Gilbert.

5. In relation to the rezoning submissions, the Council's suggested order of witnesses is based on an approach where:
  - (a) the witnesses that provide more 'general' evidence, or that only relates to a limited number of sites, are heard first;
  - (b) the remaining witnesses are then heard as a 'Panel', in the same way that Council presented its evidence in the Queenstown hearing stream .
  
6. If the Hearing Panel would prefer that the Council witnesses appear separately, rather than submission by submission, Council respectfully requests that the Panel advise the Council so it can advise its witnesses and ensure they are available at the appropriate time.
  
7. Given Ms Gilbert's unavailability during the first two weeks of the hearing, Council considered it may assist the Panel if her evidence

summary is read to the Panel, in advance of hearing evidence on other rezoning submissions.

8. The Council respectfully considers that additional time to present its opening is required for the following reasons:
- (a) to allow the Council to present a full case explaining the approach taken by the Council and its position on the Wakatipu Basin chapter of the PDP, and the transferred Stage 1 submissions on Ladies Mile and Arrowtown;
  - (b) the Council's evidence responds to approximately 6,080 submission points and 659 rezoning submissions. It is considered that it will take the better part of three days for the Panel to hear the evidence, and test the witnesses on their evidence, given the significant number of sites that are evaluated; and
  - (c) 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. The breadth and scope of the information that it seeks to present to the Panel is therefore wider, than for specific submitters.

**DATED** this 29<sup>th</sup> day of June 2018



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