

Before the Independent Hearing Panel

In the Matter of the Resource Management Act 1991 (**RMA**)

And

In the Matter of Queenstown Lakes District Council's Proposed
Inclusionary Housing Variation to the
Queenstown Lake District Plan

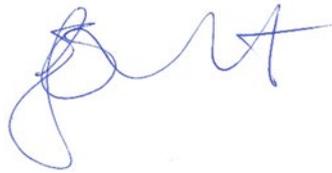
Memorandum on behalf Ladies Mile Property Syndicate Limited Partnership

(Submitter 149)

Dated 7 March 2024

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1. This memorandum is presented on behalf of Ladies Mile Property Syndicate Limited Partnership (**LMPS**).
2. LMPS appeared before the Panel yesterday (6 March), presenting legal submissions and evidence. Ms Hooegeven provided expert planning evidence.
3. During questioning from the Panel Ms Hooegeven provided an answer which she wishes to clarify to avoid inaccuracy. A memo from Ms Hooegeven is **attached** in that regard.
4. Ms Hooegeven's clarification is limited to a factual correction.



Jeremy Brabant

Counsel for Ladies Mile Property Syndicate Limited Partnership

Memorandum

To: Independent Hearing Panel – Inclusionary Housing Variation

From: Hannah Hoogeveen – Barker & Associates Limited

Date: 7 March 2024

Re: Clarification

I wish to clarify a response to a question I was asked during my presentation as planning witness for Ladies Mile Property Syndicate at the Inclusionary Housing Variation on 6 March 2024.

Questions were asked with respect to the Ladies Mile Special Zone provisions addressed at the hearing of that matter. My recollection of the question related to whether or not I agreed with the proposed provisions following expert conferencing as they relate to residential visitor accommodation in the Ladies Mile Special Zone.

I answered that I agreed with the provisions. On reflection, that answer does not capture the differing approach I took as between the wording of the provisions, and the activity status.

For completeness, I wish to clarify that whilst I agreed with the permitted provisions, I did not agree with the activity status when those permitted provisions are not complied with. The Council provisions propose a non-complying activity status where the permitted activity criteria are not met, whilst I consider that a restricted discretionary activity status is more appropriate.

Should the Panel require any further information on this topic, I am happy to assist.