

**BEFORE AN INDEPENDENT HEARING PANEL  
APPOINTED BY QUEENSTOWN LAKES DISTRICT COUNCIL**

**UNDER THE** Resource Management Act 1991

**IN THE MATTER** of a Variation to the proposed Queenstown Lakes District Plan (Te Pūtahi Ladies Mile) in accordance with Part 5 of Schedule 1 to the Resource Management Act 1991

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**MEMORANDUM OF COUNSEL ON BEHALF OF THE ANNA HUTCHINSON FAMILY  
TRUST REGARDING HEARING PANEL DIRECTIONS**

**DATED: 1 SEPTEMBER 2023**

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## MAY IT PLEASE THE HEARING PANEL

1. This memorandum is filed on behalf of the Anna Hutchinson Family Trust (**Trust**), a submitter on the Variation, and relates to Minute and Directions 1 (**Minute**) issued by the Hearing Panel (**Panel**) on 10 August 2023.
2. The purpose of this memorandum is to seek clarification and, if considered necessary by the Panel, updated or amended directions regarding engagement between parties' experts prior to the filing of statements of evidence.
3. Having carefully considered the Minute, it has been the understanding the Trust that the Panel has encouraged participants in the process (including the Queenstown Lakes District Council (**QLDC**), as proponent of the Variation) to seek to engage constructively, through their expert witnesses, throughout the process. The purpose of this engagement has been understood by the Trust to be to resolve and/or narrow down areas of agreement or disagreement, so as to assist the Panel with its deliberations and to enable a focused and efficient hearing process<sup>1</sup>.
4. The Trust does not consider the Minute to impose restrictions on when such engagement should occur, albeit that a timetable for the preparation and filing of expert evidence and for expert conferencing has been set. The Trust has expressed its interest in early engagement of its experts with corresponding experts of other parties and QLDC, particularly in light of the timetable for finalisation of the section 42A report<sup>2</sup>.
5. It appears, based in particular on attempts by the Trust to have its experts engage with their QLDC counterparts, that it does not share the Trust's understanding of the Minute and its intentions.
6. The Trust therefore requests that the Panel clarify its expectations regarding the engagement between experts throughout the Variation

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<sup>1</sup> See for example paragraphs 7.1, 7.2, 9.4, 9.7, 9.8 and 9.9 of the Minute

<sup>2</sup> Paragraphs 7.1 and 7.2 of the Minute

process and, if it is considered necessary or helpful, issue further or amended directions in accordance with paragraphs 16.1 and 16.2 of the Minute to resolve any uncertainty or ambiguity.

**DATED** this 1st day of September 2023



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James Winchester  
Counsel for the Trust