

Before the Hearings Panel

For the Proposed Queenstown Lakes District Plan

Under the

Resource Management Act 1991

In the matter

of a variation to Chapter 21 Rural Zone of the Proposed Queenstown Lakes District Plan, to introduce Priority Area Landscape Schedules 21.22 and 21.23

**MEMORANDUM ON BEHALF OF QUEENSTOWN LAKES DISTRICT COUNCIL
ADDRESSING TIMETABLING FOR COUNCIL REPLY**

28 November 2023



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MAY IT PLEASE THE PANEL

1. This memorandum is filed on behalf of Queenstown Lakes District Council (**Council**) in order to propose timetable directions for Council's reply.
2. At the time of closing the hearing, the Hearings Panel (**Panel**) indicated that it would provide Council with a list of issues for Council to respond to, by way of legal submissions and evidence, as part of the Council's reply. This list of issues was provided to Council on 15 November, along with clarification from the Panel that the list of issues is not exhaustive and that it is entirely Council's prerogative as to the issues it wishes to address or bring to the Panel's attention in reply.
3. In addition, the Panel:
 - 3.1 Directed that Council liaise as to the anticipated timeframes for further evidence and Council's reply submissions, following which the Panel would issue a timetabling minute; and
 - 3.2 Directed that Council's reply address the issue of mapping issues (including the potential for clause 16 to be relied on for certain mapping issues).
4. Council has now had the opportunity to consider the list of issues and comments from the Panel with its full expert team (a constraint being pre-planned annual leave and other hearings).

Mapping

5. As the Panel will be aware, a number of potential mapping issues were raised through the course of the hearing (we note that the Council is not in a position at this stage to comment on whether these are, in fact, issues / errors or not).
6. Council has compiled a list of these potential mapping issues, and attaches that list as **Appendix A**.

7. If any submitters consider that the Appendix A list is incomplete, Council invites submitters to advise any additions. Once all additions are received, Council will be better placed to confirm its position on the potential mapping issues.
8. The timetabling proposed below is intended to provide time for Council to consider any response from submitters, before responding as part of Council's reply, including with Council's approach to the potential mapping issues.

Directions sought in relation to the Accept / Reject recommendations spreadsheet

9. As the Panel will be aware, the Accept / Reject recommendations spreadsheet is a lengthy document, and updating it is anticipated to be a time-consuming task. Council has not yet completed updates to the spreadsheet as a result of Council's rebuttal and expert conferencing, and is interested in the Panel's views on whether an updated Accept / Reject recommendations spreadsheet will be of use to the Panel as it considers and makes recommendations.
10. If necessary, Council will be able to complete and provide an updated Accept / Reject recommendations spreadsheet at or around the time it files its reply, but it would appreciate clarification from the Panel as to whether it would like Council to complete this task, and whether it needs to be filed this side of Christmas.
11. Council would be grateful for a response from the Panel on this matter so that it can plan for this work, if it is required.

Directions sought

12. Council respectfully seeks clarification from the Panel in relation to whether it will require an updated Accept / Reject recommendations spreadsheet as part of Council's reply, and if so, whether it will require that spreadsheet prior to Christmas, or in the New Year.

13. Council also respectfully request that the Panel confirm the following timetable directions:

13.1 Any submitters who consider that there should be an addition to the list of potential mapping issues set out in Appendix A, must provide a description of the issue to the hearing administrator by **Friday, 1 December 2023** (noting that this is to be a brief description only, with relevant cross-references to evidence or submissions); and

13.2 Council's reply legal submissions and evidence to be filed with the hearing administrator by **Thursday, 14 December 2023**.

DATED this 28th day of November 2023



M G Wakefield / S L Richardson
Counsel for Queenstown Lakes District Council

Appendix A: Potential mapping issues

Location and description of potential mapping issue, and relief or change sought		Submitter (where relevant)
General		
1	Labelling of PA names on externally referenced GIS layer does not match the PA names in the schedules	
Location		
2	Kimiākau (Shotover River) ONF PA <ul style="list-style-type: none"> PA boundary at Shotover loop 	Various submitters
3, 4	Ferry Hill ONF PA <ul style="list-style-type: none"> Jon Waterson query whether the ONL mapping has been updated to reflect the direction by Judge Jackson Hansen seeking exclusion of lower slopes 	Jon Waterston (OS 145) Hansen Family Partnership (OS 142)
5	Central Whakatipu Basin ONL PA <ul style="list-style-type: none"> Location of PA boundary near Coronet Peak Road 	Blair Devlin evidence for Sir Robert Stewart (OS 84)
6, 7	Western Whakatipu Basin ONL PA <ul style="list-style-type: none"> Passion Developments seeking amendment to ONL and PA boundary above Fern Hill Hansen seeking exclusion of lower-lying land 	Passion Developments, evidence of S Skelton and R Kemp (OS186) Hansen Family Partnership (OS142)
8	Kawarau River ONF PA <ul style="list-style-type: none"> PA boundary extends over the Gibbston Valley Resort Zone 	Gibbston Vallley Station (OS93)
9	Victoria Flats ONL PA <ul style="list-style-type: none"> Submission made that the Victoria Flats are not within the ONL / PA 	Cardrona Cattle Company Limited (OS94 and FS233)
10	Dublin Bay ONL PA <ul style="list-style-type: none"> PA overlaps with part of Northlake Special Zone 	Morgan Shepherd evidence for Northlake Investments Ltd (OS 128)
11	Mount Iron ONF PA <ul style="list-style-type: none"> PA extends over the ONF boundary 	Noted by Anderson Lloyd during the hearing

12, 13	Mount Alpha ONL PA <ul style="list-style-type: none"> • Hawthenden seeking exclusion of land • Request to include Studholme Road 	Hawthenden Farm (OS 3) Florence Micoud (OS 7)
14	Hawea South North Grandview ONL PA <ul style="list-style-type: none"> • Seeking exclusion of land 	Jeremy Burdon, Jo Batchelor, Andrew Donaldson (OS 182)
15	Slope Hill ONF PA <ul style="list-style-type: none"> • Seeking exclusion of lower slopes 	Milstead Trust (OS 82)