

**BEFORE HEARING COMMISSIONERS  
IN QUEENSTOWN | TĀHUNA ROHE**

**UNDER THE** Resource Management Act 1991 (“**Act**”)

**IN THE MATTER OF** the proposed “Inclusionary Housing” Variation to Queenstown Lakes District Council’s Proposed District Plan

**AND IN THE MATTER OF** submissions on the Variation

**BETWEEN** **GLENPANEL DEVELOPMENTS LIMITED (“GDL”)**  
Submitter

**AND** **QUEENSTOWN LAKES DISTRICT COUNCIL**  
Planning authority

**SECOND MEMORANDUM ON BEHALF OF GDL**

*Before a Hearing Panel:* Jan Caunter (Chair),  
Jane Taylor, Ken Fletcher and Lee Beattie

1. By Minute 7 dated 14 March 2024, the Panel directed:
 

Any response from Mr Gardner-Hopkins to Commissioner Fletcher’s Memorandum dated 14 March 2024 is to be lodged with the hearing secretary, Ms Lynley Scott, no later than to 12 noon on Tuesday 19 March 2024.
2. GDL thanks the Panel for the opportunity to respond to Commissioner Fletcher’s memorandum of evidence; and Commissioner Fletcher himself for taking the time to prepare that memorandum. It is very helpful to have had the extent of the Commissioner’s independent inquiries confirmed, as well as the Commissioner’s understanding of the “thesis underlying the Variation”.
3. I am instructed that GDL accepts that Commissioner Fletcher has been consistent in his testing of the theses he identifies in his questions of most, if not all, developer witnesses and planners.
4. GDL remains concerned, however, that the nature of the questioning suggests an acceptance of the proposition that: because a landowner/

developer obtains an uplift in value due to a zoning change, it is fair for the Council to take a financial contribution from them for affordable housing. GDL considers that proposition to amount to an evident logical fallacy (at least as a generalisation), as it fails to take into account the myriad of circumstances that go into what might be considered “fair”.

5. Accordingly, GDL maintains its request. It also files a short additional supplementary statement from Mr Oliver responding to the relevance of the current position of Statistics New Zealand in respect of these proceedings, which was the trigger for Commissioner Fletcher’s (limited) independent investigations.



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**Project Manager**  
**19 March 2024**