

BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL HEARINGS PANEL

UNDER the Resource Management Act 1991

IN THE MATTER of the review of parts of the Queenstown Lakes District Council's District Plan under the First Schedule of the Act

AND

IN THE MATTER of submissions and further submissions by **QUEENSTOWN PARK LIMITED AND REMARKABLES PARK LIMITED**

**MEMORANDUM OF COUNSEL FOR QUEENSTOWN PARK LIMITED AND
REMARKABLES PARK LIMITED**

HEARING STREAM 13 – QUEENSTOWN MAPPING

31 JULY 2017

**BROOKFIELDS
LAWYERS**

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MAY IT PLEASE THE PANEL:

1. Further to our memorandum of 12 July 2017, Queenstown Park Limited (**QPL**) and Remarkables Park Limited (**RPL**) seek leave to file the following supplementary evidence:
 - (a) Planning evidence from David Serjeant addressing the Water Conservation (Kawarau) Order 1997, Mr Buxton's observations regarding the Queenstown Park Special Zone (**QPSZ**) provisions (at paragraph 3.24 of Mr Buxton's evidence), precedent concerns, the ability to establish a gondola within the Remarkables Park Zone and any matters arising from the comments of other experts set out below;
 - (b) Landscape evidence from Stephen Brown addressing visibility of RR5 and RR6 from the Crown Range and Ladies Mile (SH6), possible assessment criteria to address glare/reflectivity, enhancement planting and other matters raised at paragraph 4.31 of Ms Mellsop's evidence, and intrinsic and perceived naturalness (responding to comments from Ms Mellsop). Information regarding the Buildmedia modelling (in particular the cabin dimensions) might also be addressed;
 - (c) Landscape and design evidence from Rebecca Skidmore addressing development yield and pattern, and assessment criteria (responding to comments from Ms Mellsop);
 - (d) Farming evidence from Alison Dewes responding to paragraph 3.18 of Mr Buxton's evidence; and
 - (e) Economic evidence from John Ballingall and/or Simon Milne addressing the tourism and agricultural dichotomy evident in the Council's evidence (Buxton and Osborne).
2. It is anticipated that no one supplementary statement of evidence would exceed 3 pages (with the exception of Mr Serjeant who may append an amended set of QPSZ provisions to his supplementary statement).
3. Counsel submits that it is better that any supplementary evidence be in writing and pre-filed, rather than being given orally at the hearing in response to questions or as part of a summary. In fact, a primary reason for seeking leave to pre-file

supplementary evidence is to avoid new evidence in the summary statements produced on the day of the hearing of the QPL and RPL submissions.

4. For completeness, we advise that counsel is liaising with counsel for the Council in respect of possible expert conferencing (most likely landscape and planning).

DATED the 31st day of July 2017



J D Young

Counsel for Remarkables Park Limited and Queenstown Park Limited