

**BEFORE THE INDEPENDENT
HEARINGS PANEL FOR THE
QUEENSTOWN LAKES DISTRICT
COUNCIL**

Under the Resource Management
Act 1991

In the matter of the Urban
Intensification Variation
to the proposed
Queenstown Lakes
District Plan.

MEMORANDUM ON BEHALF OF THE

LISMORE STREET GROUP

1 September 2025

MACTODD LAWYERS

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May it please the Panel

1. Counsel appeared for the Lismore Street group of submitters on Monday 25 August 2025, together with the group's planning expert, Mr Vivian.¹
2. During the presentation of the group submission, the Panel extended an offer for the group (via Mr Vivian), should it wish to do so, to explore the opportunity for a restricted discretionary (**RDIS**) rule framework in the event of a breach of the RL height rule promoted by the group.
3. While the group is appreciative of the offer and the time provided to consider an alternative default activity status for the rule, they remain of the view (supported by Mr Vivian's expert evidence) that a fully discretionary activity status is appropriate and have therefore elected not to put forward a framework for a RDIS rule.

Dated 1 September 2025



Jayne Macdonald

Counsel for the Lismore Street Group

¹ As well as lay witnesses Mr Steenson and Mr Osborne