

**BEFORE THE HEARINGS PANEL  
FOR THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN**

Under the **RESOURCE MANAGEMENT ACT 1991**

In the matter **OF A PRIVATE PLAN CHANGE TO THE QUEENSTOWN  
LAKES PROPOSED DISTRICT PLAN: PROPOSED PLAN  
CHANGE 1 THE HILLS RESORT ZONE**

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**MEMORANDUM OF COUNSEL TO THE HEARINGS PANEL ON BEHALF OF  
QUEENSTOWN LAKES DISTRICT COUNCIL**

Dated: 13 February 2026

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**BUDDLE FINDLAY**

Barristers and Solicitors  
Wellington

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## **MAY IT PLEASE THE HEARINGS PANEL**

1. This memorandum is filed on behalf of Queenstown Lakes District Council (**Council**). We have been instructed by the Council (in its reporting role) in respect of the private plan change requested by The Hills Resort Limited (**THRL**), and can be contacted by email or phone as follows:
  - (a) Thad Ryan: [thaddeus.ryan@buddlefindlay.com](mailto:thaddeus.ryan@buddlefindlay.com); 04 498 7335.
  - (b) Matthew Dicken: [matthew.dicken@buddlefindlay.com](mailto:matthew.dicken@buddlefindlay.com); 04 462 0935.

### **Evidence on behalf of the Council**

2. In accordance with the timetable set by Hearings Panel (**Panel**) in its Amended Minute 1 dated 13 January 2026 (**Minute 1**), the Council's section 42A report / evidence and accompanying technical evidence is filed with this memorandum. The evidence being filed is as follows:
  - (a) Craig Barr (primary s42A report / planning evidence);
  - (b) Bridget Gilbert (landscape evidence); and
  - (c) Antoni Facey (transport evidence).

### **Expert witness conferencing**

3. In respect of expert witness conferencing, Minute 1 directs as follows:

*9.3 Following receipt of submitter expert evidence, counsel representing the Queenstown Lakes District Council shall confer with the relevant submitters and within 2 working days provide the Hearing Panel and parties with a proposed recommendation and conferencing timetable, which should include whether a facilitator is proposed, the proposed venue, a draft agenda outlining topics, attendees, days and times for conferencing, with planning conferencing to be last. If there is any issue, counsel for the Council may raise that for the Hearing Panel and seek Directions.*

4. In line with those directions, counsel will liaise with the Requestor, and any submitters who file expert evidence, in order to propose / arrange expert conferencing. For completeness, the Council's expert witnesses have confirmed they are willing to partake in expert conferencing given the efficiency it will bring to the hearing process.

5. Minute 1 currently directs expert conferencing to be arranged between 16 – 20 March. Noting that submitter evidence is due to be filed on 20 March 2026, counsel will seek to arrange conferencing for as soon as possible following 20 March, and no later than the week beginning 30 March.
6. Counsel respectfully requests that the directions of the Panel in Minute 1 be varied to reflect the above proposed dates for expert conferencing.

**Hearing order and reply**

7. The hearing is set down for 14 – 16 April 2025. Minute 1 provides as follows in respect of the order of the hearing:

*13.2 The order (subject to the efficient running of the hearing) of the hearing will be:*

- a) *any procedural matters;*
  - b) *the Council (any legal submissions and the 42A report author(s) and any expert witnesses);*
  - c) *submitters in support and opposition of the plan change; and*
  - d) *the Council's right of reply.*
8. Given this is a private plan change proposal, counsel submit that it would be more appropriate / efficient for the Requestor to present first, followed by submitters, then the Council (s42A reporting officer / witnesses), with the Requestor then able to reply.
  9. If the Panel agrees, Counsel respectfully request that the directions of the Panel in Minute 1 be varied to reflect the proposed updated hearing order.

**Dated:** 13 February 2026



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**T J Ryan / M J Dicken**

Counsel for Queenstown Lakes  
District Council