

IN THE MATTER of the Resource
Management Act 1991

AND

IN THE MATTER of Stage 3 of the
Queenstown Lakes
Proposed District Plan

MINUTE 37 – TIMING OF COUNCIL REPLY

1. The Council is due to file its written reply this coming Monday 7 September.
2. Counsel for the Council has made application for an extension of time to enable Ms Grace, the relevant Council Officer dealing with Rural Visitor Zone matters, to complete her reply. To the extent the Council's legal submissions are dependent on the content of Ms Grace's evidence, Counsel seek an extension of time for those also. Counsel's memorandum records that the Council team are on track to complete the balance of the reply on time.
3. The Rural Visitor Zone occupied a significant part of the Stage 3 hearing. Ms Grace faced a sizeable task pulling together her reply on the matters raised as it was. I appreciate that the detail of the questions posed to the Council in Minute 35 has necessitated further work for Ms Grace. Last but not least, I also understand that although my Minute was completed on 24 August, due to an administrative glitch within the Council, it did not arrive on Ms Grace's desk (and that of Counsel) until the 28th.
4. The combination of these factors makes a compelling case for Ms Grace to have more time to complete her evidence in reply, if possible.
5. Although the Panel will be meeting to commence deliberations on 14 September, it will be dealing with Rural Visitor Zone matters in the latter part of the week. Accordingly, I consider that the Panel can accommodate counsel's request.
6. On that basis, I direct that the Council may file the planning reply evidence of Ms Grace and the associated legal reply on the Rural Visitor Zone by Thursday 10 September 2020 at 5pm.

Dated 2 September 2020

A handwritten signature in blue ink, consisting of a large, stylized 'T' followed by a series of horizontal strokes.

**Trevor Robinson
Chair
Stage 3 Hearing Panel**

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

IN THE MATTER of the Resource Management
Act 1991

AND

IN THE MATTER of Stage 3b Proposed District
Plan

**MEMORANDUM OF COUNSEL SEEKING EXTENSION TO THE FILING OF COUNCIL'S
REPLY FOR THE RURAL VISITOR ZONE (PLANNING AND LEGAL)**

2 September 2020

 **Simpson Grierson**
Barristers & Solicitors

S J Scott / R P Mortiaux
Telephone: +64-3-968 4018
Facsimile: +64-3-379 5023
Email: sarah.scott@simpsongrierson.com
PO Box 874
SOLICITORS
CHRISTCHURCH 8140

MAY IT PLEASE THE PANEL:

1. This memorandum of counsel is filed on behalf of Queenstown Lakes District Council (**Council**). Council is due to file 20 statements of reply evidence together with its legal reply by 1pm Monday 7 September 2020.

2. Council respectfully seeks an extension for the planning reply evidence of Ms Grace, in relation to the Rural Visitor Zone (**RVZ**) text and rezonings, for the following reasons:
 - 2.1 A significant amount of additional information has been provided in relation to the RVZ throughout the course of the hearing. The nature and complexity of the detail provided in this information requires careful assessment and consideration. Ms Grace has not had ample opportunity to thoroughly assess the high quantity of additional information received; and
 - 2.2 Ms Grace is required to respond to a comprehensive set of questions raised by the Panel in relation to the RVZ. Although these questions were issued on the 24 August, unfortunately they were not received by Counsel or Ms Grace until Friday 28 August 2020.

3. To provide Ms Grace with sufficient time to consider this additional information and provide a meaningful response, Council respectfully requests an extension to file the planning reply evidence of Ms Grace and the associated legal reply on the RVZ by Thursday 10 September 2020, 5pm. For clarity, all of the legal reply except RVZ specific matters will be covered in the Council's Legal Reply filed by Monday 7 September, including the response to Mr Nolan QC's jurisdictional issue on behalf of Scope Resources.

DATED this 2nd day of September 2020



S J Scott / R P Mortiaux
Counsel for Queenstown Lakes District Council