

BEFORE QUEENSTOWN LAKES DISTRICT COUNCIL

IN THE MATTER of the Resource Management Act
1991

AND

IN THE MATTER of the Queenstown Lakes District
Plan Review Hearing Stream 04

**Memorandum of Counsel
08 July 2016**

G W Stalker Family Trust:
Mike Henry:
Mark Tylden:
Wayne French:
Dave Finlin:
Sam Strain – 535/534:
Ashford Trust – 1256:
Bill & Jan walker Family Trust - 532/1259:
Byron Ballan – 530:
Crosshill Farms Limited – 531:
Bill and Jan Walker Family Trust – 1267:
Robert and Elvena Heywood - 523/ 1273:
Roger and Carol Wilkinson – 1292:
Slopehill Joint Venture - 537/ 1295:
Wakatipu Equities - 515/1298:

ANDERSON LLOYD
LAWYERS
QUEENSTOWN

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MAY IT PLEASE THE PANEL:

1. This request is made on behalf of the submitters listed in the front page of this Memorandum.
2. Counsel requests leave for the planning evidence of Ben Farrell to be lodged by **4pm Wednesday 20 July 2016**. The reasons for this request are:
 - (a) Ben Farrell has been occupied for the most of this week preparing for the continuation of an Environment Court hearing scheduled to run all next week through to Friday 15 July 2016. The hearing is in Invercargill, and Mr Farrell has to be present through the hearing as the planner presenting for his client. This leaves little time for Mr Farrell to prepare evidence for the DPR Hearing Stream 04 Subdivision, in a considered manner.
 - (b) The evidence will be confined to two issues, being the issue of controlled activity status versus restricted discretionary activity status for subdivision generally, and the issue of whether the minimum lot size in the Rural Lifestyle zone (whether that be 1ha or 2ha) should be a minimum area lot size or a minimum average area lot size. Therefore the evidence will not be lengthy and will be able to be read relatively quickly.
 - (c) Counsel is also instructing Jeff Brown to address the same issues on behalf of a second group of clients (along with other clients of Jeff Brown). If Mr Farrell has the opportunity of reading Mr Brown's final evidence prior to preparing his own evidence, he may be able to adopt some of Mr Brown's evidence and may be able to avoid what might otherwise be unnecessary repetition.
 - (d) The Panel will be better informed if Mr Farrell can give considered attention to these issues during the first part of the week commencing Monday 18 July 2016 than if evidence has to be prepared under pressure during the coming week.



WP Goldsmith/RE Hill
Counsel Acting