

**BEFORE THE INDEPENDENT HEARING PANEL
FOR THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN**

Under the	Resource Management Act 1991
In the matter	of the Urban Intensification Variation to the proposed Queenstown Lakes District Plan

**MEMORANDUM OF COUNSEL FOR QUEENSTOWN LAKES DISTRICT COUNCIL
REGARDING EXPERT CONFERENCING**

8 July 2025



Sarah Scott / Shanae Richardson
T: +64 3 968 4018
sarah.scott@simpsongrierson.com
shanae.richardson@simpsongrierson.com
PO Box 874 Christchurch

MAY IT PLEASE THE PANEL

Introduction

1. This memorandum is filed on behalf of Queenstown Lakes District Council (**Council**) in relation to the Urban Intensification Variation to the proposed Queenstown Lakes District Plan (**PDP**) (**Variation** or **UIV**).

2. This memorandum responds to paragraph 9.2 and 9.3 of Minute 1 from the Panel:

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.

If, following receipt of the proposed conferencing timetable, expert conferencing is then directed by the Hearing Panel, it is expected that all relevant expert witnesses will attend - and be in person, unless special circumstances apply. The timeframe for conferencing is tight and, so that the s42A experts have time to prepare their rebuttal, conferencing (as required) shall occur from 10-16 July 2025 (with planning conferencing on 15/16 July as required). All expert witnesses are expected to arrange their calendars to best fit within this timeframe.

3. The Council received the majority of the Submitter Evidence on the afternoon of Friday 4 July, with some evidence received on Monday 7 July. Following a review of the evidence filed, Council considers that urban design expert conferencing could potentially be of value between Mr Cameron Wallace and Ms Paula Costello for the 'Multiple Queenstown Submitters'. Counsel has directly contacted counsel (Mr Josh Leckie) to arrange these discussions. Council proposes that no formal directions are required, and that counsel can ensure the necessary arrangements be made. Therefore, no directions are sought in respect of expert conferencing.

Reasoning

4. All of the evidence that has been filed, is site (or at least area, eg Arrowtown) specific, with a general summary as follows:¹
 - (a) Planning: 21, mostly² site/area specific;
 - (b) Urban Design: six, all site/area specific;
 - (c) Heritage: one, specific to Arrowtown;
 - (d) Noise: one, specific to Queenstown Airport;
 - (e) Landscape: two, each site specific; and
 - (f) Groundwater: one, site specific; and
 - (g) Company evidence: two, each site specific.
5. Council did not file any groundwater, noise or landscape evidence, so conferencing cannot happen in those areas.
6. Submitters did not file any infrastructure or economic evidence, so conferencing cannot happen in those areas.
7. That leaves urban design, heritage and planning:

Urban design:

- (a) A number of the urban design briefs filed by submitters relate to land (Plan Change 50) that Council considers is not within the scope of the UIV. Scope will be addressed in Council's opening legal submissions, but Council does not agree to expend resources on conferencing on submissions that are not considered to be 'on' the UIV/variation;
- (b) All remaining urban design briefs filed by submitters are site specific. As set out above, the only remaining urban design statement where Council considers expert conferencing may result in some additional matters is

1 This summarises the number of separate statements received. Some experts have filed one statement that covers a number of different submissions and submission sites, whereas other experts have filed different statements for different submitters.

2 With the exception of some planning evidence on definitions which would apply wherever the defined term is used in the PDP.

agreed, is for the evidence filed by Ms Paula Costello (filed for the 'Multiple Queenstown Submitters');

- (c) In terms of the other urban design briefs filed that are on submissions considered to be 'on' the UIV, if that evidence is agreed with (including whether that changes a recommendation on a submission), that will be made clear in Council's rebuttal evidence, and it is not considered that expert conferencing would be useful to narrowing issues;

Heritage:

- (d) The one heritage brief filed relates to Arrowtown. Following advice from Council's heritage expert, we have concluded that we do not expect expert conferencing would result in any changes to the opinions or narrow areas of disagreement. Council considers it is more efficient for it to focus on rebuttal evidence;

Planning:

- (e) As mentioned above, all planning briefs are site specific. It would be a huge commitment for Council's planners to engage in expert conferencing with various planners, on a site-specific basis. Council has carefully considered whether there would be value in some expert conferencing, but given the briefs that have been filed, has not been able to identify any sensible candidates where we can expect value would be obtained (and ultimately, resulting in less hearing time); and
- (f) If any submitter evidence is agreed with (including whether that changes a recommendation on a submission), that will be made clear in Council's rebuttal evidence.

DATED this 8th day of July 2025



Sarah Scott / Shanae Richardson
Counsel for Queenstown Lakes District Council