

**BEFORE THE HEARINGS PANEL APPOINTED BY THE CENTRAL
OTAGO DISTRICT COUNCIL**

UNDER the Resource Management Act 1991

IN THE MATTER of RC230179 an application for a 33-lot
subdivision at Rocky Point on Tarras-
Cromwell Road (SH8)

BY **TKO PROPERTIES LIMITED**

Applicant

MEMORANDUM OF COUNSEL FOR THE APPLICANT

Dated: 14 February 2025

MAY IT PLEASE THE PANEL:

- [1] On 19 December 2024, the Panel directed counsel for the Applicant to confer with counsel for the Department of Conservation (**DoC**) and lodge a memorandum setting out:
- (a) the proposed timing and scope of expert ecological conferencing; and
 - (b) subsequent proposed directions including a timetable for the Applicant's reply and whether any additional hearing time might be sought to address matters raised in conferencing and/or the reply material.
- [2] This direction followed advice from the Applicant that Dr Wells, its ecological expert, had prepared a further report relating to his proposed ecological offset model.
- [3] The Applicant confirms it has been in discussions with DoC as to the timing and scope of expert conferencing. Further, Dr Wells has updated his report and recommendations for a revised offset model which counsel received a copy of this week. Counsel are currently conferring as to a proposed set of questions for the experts to consider based on this report. Counsel are also waiting to hear from their experts as to a suitable time. It is expected progress on both of these matters will be made next week.
- [4] It is anticipated conferencing itself will take around 2-4 hours and will be able to occur online.
- [5] Accordingly, it is requested that the Applicant provide via memorandum by **21 February 2025**:
- (a) confirmation as to timing of expert conferencing and the questions the experts will be considering; and
 - (b) associated directions including a timetable for the Applicant's reply and if any additional hearing time is sought.

Dated: 14 February 2025

A handwritten signature in blue ink, appearing to be 'REM Hill' or similar, written in a cursive style.

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R E M Hill / B B Gresson
Counsel for the Applicant