

**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 December 2024

MAY IT PLEASE THE PANEL:

[1] On 25 November 2024, the Hearings Panel issued a minute directing that the Applicant lodge its written right of reply by 16 December 2024. It noted:

17. The Panel will review the Applicant's right of reply and additional statements of evidence and will then determine:

(a) ...

(b) whether we then have sufficient information to make our decision, including the need for any expert witness conferencing.

[2] Mr Wells, the Applicant's ecological offsetting expert, undertook a further site visit this week and has identified further matters relevant to the offsetting model.

[3] He is currently preparing a memorandum setting out the result of his further site visit and findings. He expects to complete this and provide his memorandum to counsel on Monday 16 December 2024.

[4] Subject to receipt of that memorandum, the Applicant considers it may be useful for the ecology experts to undertake witness conferencing on a confined set of matters relevant to the offsetting proposed.

[5] Counsel intends to file a further memorandum and seek directions to this effect next week. In the interim, it respectfully seeks directions that:

(a) the current timetable is suspended; and

(b) the Applicant is to file a memorandum by 20 December 2024 seeking further directions, including regarding the timing and scope of expert witness conferencing.

Dated: 13 December 2024



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