

**BEFORE THE COMMISSIONERS 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

Dated: 6 November 2024

MAY IT PLEASE THE COMISSION

- [1] After lodgment of evidence in chief, two matters have arisen which the Applicant considers would be most efficiently addressed by way of supplementary evidence.
- [2] The two matters relate to:
- (a) The landscape evidence attachments as filed did not clearly outline the proposed areas of landscaping for lots 27-29. To address this, Mr Baxter has prepared a refined version of these plans to be included in the full plan set.
 - (b) The Applicant's expert witness advising on fire related risk has, since the time of filing evidence, received further feedback from FENZ.
- [3] Given both of the above matters are relevant to issues raised in the s42A addendum report, and may be of relevance for submitters to consider, the Applicant respectfully requests leave to file these supplementary statements now. The request is sought on the basis that:
- (a) The further matters could be tabled in the course of the hearing anyway, however filing in advance will give Council, submitters, and the Panel, a greater opportunity to engage with the matters.
 - (b) The two matters addressed are not significant matters of evidence, nor do they seek to change the scope or nature of the proposal.

Dated 6 November 2024



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R E Hill / B B Gresson
Counsel for the Applicant