

**BEFORE THE HEARINGS PANEL
FOR THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN**

IN THE MATTER of the Resource Management
Act 1991

AND

IN THE MATTER of Stage 3 and 3b Proposed
District Plan

MEMORANDUM OF COUNSEL PROVIDING INFORMATION TO HEARINGS PANEL

21 JULY 2020



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MAY IT PLEASE THE PANEL:

1. This memorandum of counsel is filed on behalf of Queenstown Lakes District Council (**Council**) in response to Minute 27 of the Hearings Panel dated 3 July 2020 (**Minute**) requesting Council provide certain information.

2. Attached to this memorandum are the following documents:
 - 2.1 **Appendix A:** Gibbston Valley Station Limited, Environment Court Consent Order for the Gibbston Valley Resort Zone;
 - 2.2 **Appendix B:** Section 32AA Report for the Gibbston Valley Resort Zone;
 - 2.3 **Appendix C:** Joint Witness Statement for Expert Conferencing (Landscape) and Joint Witness Statement for Expert Conferencing (Planning) for the Gibbston Valley Resort Zone;
 - 2.4 **Appendix D:** Relevant draft Consent Documentation filed with, but not yet issued by, the Environment Court (listed separately below);
 - 2.5 **Appendix E:** Hāwea Community Plan Review and Recommendations for the upcoming District Plan Review, Hāwea Community Association, July 2015 (note this is not a Council document);
 - 2.6 **Appendix F:** Universal SHA Decision and Consent;
 - 2.7 **Appendix G:** Deed between Universal Developments Hāwea Limited, Queenstown Lakes Community Housing Trust and Council; and
 - 2.8 **Appendix H:** Glenorchy Community Plan.

3. In response to paragraph [4] of the Minute, the following draft Consent Orders, filed with the Environment Court, but not yet issued, are attached at **Appendix D1 – D10**:
 - 3.1 **Appendix D1:** Topic 1, Subtopic 4 – updated, Regionally Significant Infrastructure;
 - 3.2 **Appendix D2:** Topic 2, Subtopic 11 – updated, Landscapes and Regionally Significant Infrastructure;
 - 3.3 **Appendix D3:** Topic 17 - Regionally Significant Infrastructure and Energy and Utilities;
 - 3.4 **Appendix D4:** Topic 3 – Urban Development dated 14 March 2019;
 - 3.5 **Appendix D5:** Topic 3 – Urban Development dated 9 April 2019 (note this should be 9 April 2020);
 - 3.6 **Appendix D6:** Topic 11 – Informal Airports;

- 3.7 **Appendix D7:** Topic 16 – Gibbston Valley Station Limited (resolving application for rehearing, the Joint Statement arising from Expert Planner Conferencing is also provided);
 - 3.8 **Appendix D8:** Topic 18 – Rural Zone, Subtopics 1 to 7;
 - 3.9 **Appendix D9:** Topic 20 – Rural Residential / Rural Lifestyle; and
 - 3.10 **Appendix D10:** Topic 26 - Earthworks.
4. There are five additional draft consent orders (listed below) that are filed with the Environment Court, but not understood to be of any relevance to Stage 3 matters. Should the Panel require copies, the consent documentation for the following topics can be provided at short notice:
- 4.1 Topic 16 – Willowridge Developments Limited (rezoning);
 - 4.2 Topic 16 – Orchard Road Holdings (rezoning);
 - 4.3 Topic 19 – Rural Zone, Ski Area Sub Zones (text and rezoning);
 - 4.4 Topic 23 – Allenby Farms Limited (rezoning); and
 - 4.5 Topic 2 Subtopic 9 – Rural Landscapes, Activities on Lakes and Rivers. Note that the Environment Court has asked parties some questions on this draft consent order and as a result, further work is being done at present.

Gibbston Valley Resort Zone

5. Although not specifically requested by the Panel, we have provided copies of the Section 32AA analysis and two joint witness statements that were (amongst other information) filed with the Court in support of the Gibbston Valley Resort Zone draft consent order. They demonstrate the significant amount of analysis that went into the drafting of the Gibbston Valley Resort Zone, including the proportion of residential activity associated with a resort so as to accord with the PDP definition of a resort.
6. Subsequent to the issuing of the consent order in **Appendix A**, Gibbston Valley Station Limited (**GVS**) gave notice of motion for a rehearing relating to the issued consent order. GVS and Council have subsequently filed the documents in **Appendix D7**.

7. During the course of the Hearing, the Panel requested Ms Devlin provide a copy of the Glenorchy Community Plan. Although not subject to the Panel's information request, that document is provided at **Appendix H**.

DATED this 21st day of July 2020



S J Scott / R P Mortiaux
Counsel for Queenstown Lakes District Council