

**BEFORE HEARING COMMISSIONERS  
IN QUEENSTOWN | TĀHUNA ROHE**

**UNDER THE** Resource Management Act 1991 (“**Act**”)

**IN THE MATTER OF** a variation to Chapter 21 Rural Zone of the Proposed Queenstown Lakes District Plan, to introduce Priority Area Landscape Schedules 21.22 and 21.23 (**PA Schedules**)

**AND IN THE MATTER OF** submissions on the PA Schedules

**BETWEEN** **THE MILSTEAD TRUST**  
Submitter

**AND** **QUEENSTOWN LAKES DISTRICT COUNCIL**  
Planning authority

**MEMORANDUM ON BEHALF OF MILSTEAD TRUST:  
RESPONSE TO MINUTE OF 29 NOVEMBER 2023**

*Before a Hearing Panel:* Jane Taylor (Chair),  
Commissioner Peter Kensington and Councillor Quentin Smith

1. The Panel directed, in its minute of 29 November 2023 (among other things):

... (b) Any submitters who consider that there should be an addition to the list of potential mapping issues, set out in Appendix A of the Memorandum, must provide a description of the issue to the hearing administrator by 4pm Monday, 4th December 2023 (noting that this is to be a brief description only, with relevant cross-references to evidence or submissions); ...

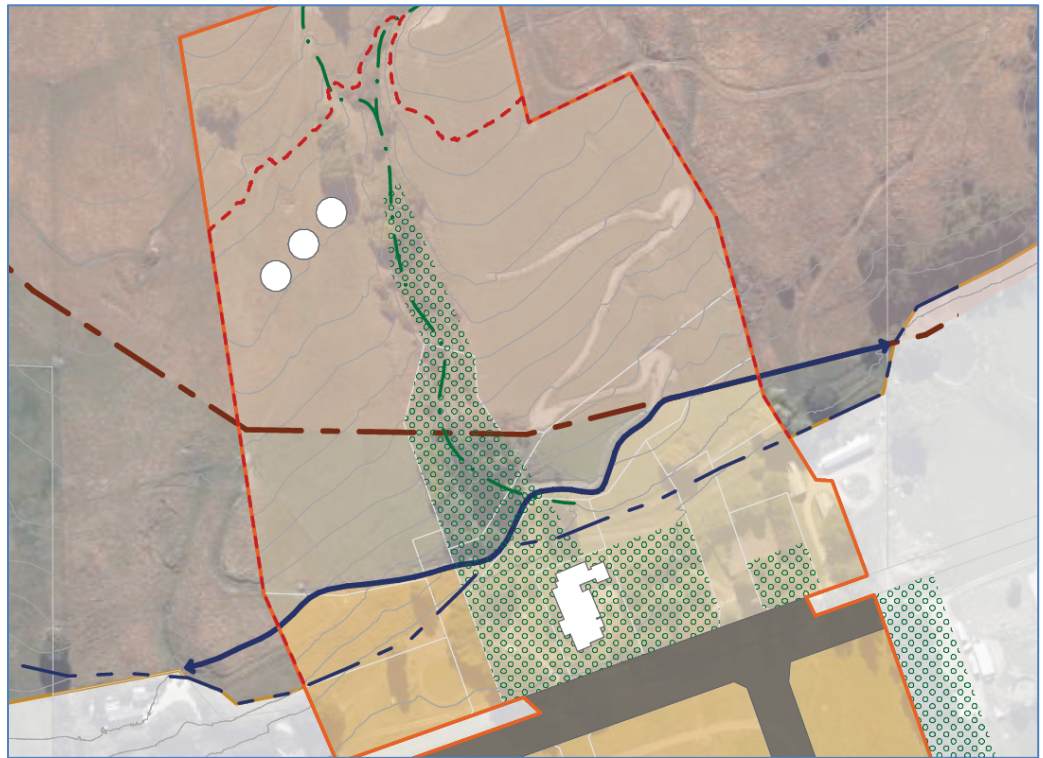
2. Appendix A of the Council’s memorandum sets out, as relevant:

Location and description of potential mapping issue, and relief or change sought		Submitter (where relevant)
15	Slope Hill ONF PA • Seeking exclusion of lower slopes	Milstead Trust (OS 82)

3. It occurs to the Milstead Trust that the phrase “exclusion of the lower slopes”, while correct as far as it goes, does not actually give the Panel a clear understanding of the extent of change sought. This is at least, in part, a consequence of the experts failing to conference on the extent of any

change, as the Council's expert (it is understood) took the position that any change to the ONF line was out of scope/ jurisdiction and so could not be discussed as part of witness conferencing. This itself is a concern from a process perspective.

- 4. In any event, and so that the Panel has better context, the extent of the change that would be accepted, at this stage, as satisfying the submitter's concerns, is shown on the plan attached to this memorandum, reproduced at small scale for convenience here as follows (noting for present purposes that the current ONF line is the blue long dash, two short dash, line; and the proposed new ONF line that the submitter would accept is the solid blue line):



- 5. The change sought is considered modest in context, but is of significant importance to the submitter.

**Project Manager for the Milstead Trust**  
**1 December 2023**