

Under the Resource Management Act 1991 (**RMA**)

In the matter of Priority Area Landscape Schedules Variation to the  
Queenstown Lakes Proposed District Plan

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**Memorandum of counsel on behalf of Anderson Lloyd submitters**

5 December 2023

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**Submitters' solicitors:**

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**anderson  
lloyd.**

**May it please the Panel**

- 1 This memorandum of counsel is provided on behalf of various submitters and further submitters represented by Anderson Lloyd in response to the memorandum on behalf of Queenstown Lakes District Council (**QLDC**) addressing timetable for reply dated 28 November 2023 (**QLDC Memorandum**).

**Response to potential mapping issues set out in Appendix A to the QLDC Memorandum**

- 2 The Anderson Lloyd parties' responses to Appendix A to the QLDC Memorandum are shown as tracked changes in Appendix A to this memorandum.

Dated this 5<sup>th</sup> day of December 2023



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Maree Baker-Galloway/Rosie Hill  
Counsel for various submitters to the landscape schedules

## Appendix A

Location and description of potential mapping issue, and relief or change sought		Submitter (where relevant)
<b>General</b>		
1	Labelling of PA names on externally referenced GIS layer does not match the PA names in the schedules	
<b>Location</b>		
2	Kimiākau (Shotover River) ONF PA <ul style="list-style-type: none"> <li>PA boundary at Shotover loop</li> </ul>	Various submitters
3, 4	Ferry Hill ONF PA <ul style="list-style-type: none"> <li>Jon Waterson query whether the ONL mapping has been updated to reflect the direction by Judge Jackson</li> <li>Hansen seeking exclusion of lower slopes</li> </ul>	Jon Waterston (OS 145) Hansen Family Partnership (OS 142)
5	Central Whakatipu Basin ONL PA <ul style="list-style-type: none"> <li>Location of PA boundary near Coronet Peak Road</li> </ul>	Blair Devlin evidence for Sir Robert Stewart (OS 84)
6, 7	Western Whakatipu Basin ONL PA <ul style="list-style-type: none"> <li>Passion Developments seeking amendment to ONL and PA boundary above Fern Hill</li> <li>Hansen seeking exclusion of lower-lying land.</li> </ul>	Passion Developments, evidence of S Skelton and R Kemp (OS186) Hansen Family Partnership (OS142)
8	Kawarau River ONF PA <ul style="list-style-type: none"> <li>PA boundary extends over the Gibbston Valley Resort Zone</li> </ul>	Gibbston Vallley Station (OS93)
9	Victoria Flats ONL PA <ul style="list-style-type: none"> <li>Submission made that the Victoria Flats are not within the ONL / PA</li> </ul>	Cardrona Cattle Company Limited (OS94 and FS233)
10	Dublin Bay ONL PA <ul style="list-style-type: none"> <li>PA overlaps with part of Northlake Special Zone</li> </ul>	Morgan Shepherd evidence for Northlake Investments Ltd

		(OS 128)
11	<p>Mount Iron ONF PA</p> <ul style="list-style-type: none"> <li>PA extends over the ONF boundary</li> </ul>	Noted by Anderson Lloyd during the hearing
12	<p><u>Land within non-Rural Zones (including Exception Zones, and Operative zones):</u></p> <ul style="list-style-type: none"> <li><u>Cardrona Valley PA</u></li> <li><u>Peninsula Hill ONF PA</u></li> <li><u>Victoria Flats PA</u></li> </ul> <p>Alternative relief sought by a number of submitters to 'carve out' the mapping of priority areas over non-Rural Zones (including exception zones and operative zones). The above list pertains to Anderson Lloyd clients only (references to evidence: Mr Espie, Ms Shepperd, Mr Farrell summary statements). AL legal submissions, dated 7 November 2023 at paras 12 – 14.</p>	<ul style="list-style-type: none"> <li><u>Mt Cardrona Station Limited;</u></li> <li><u>Coneburn Preserve Holdings Limited and Henley Downs Farm Holdings Limited;</u></li> <li><u>Soho Ski Area Limited and Blackmans Creek Holdings 1 LP</u></li> <li><u>RealNZ Limited;</u></li> <li><u>Rock Supplies NZ Limited;</u> and</li> <li><u>The Station at Waitiri Limited</u></li> </ul>
13	<p>Hawea South and North Grandview Priority Area</p> <ul style="list-style-type: none"> <li><u>Burdon seeks its land, and the Glen Dene land immediately to the north, be excluded from the PA. AL legal submissions dated 7 November 2023 at pages 28 - 30.</u></li> </ul>	<p>Jeremy Burdon, Jo Batchelor, Andrea Donaldson</p>