

BEFORE THE DISTRICT HEARINGS PANEL

Under the Resource Management Act 1991

In the matter or

**Proposed Queenstown Lakes District Plan – Chapter 30 Energy and
Utilities**

and

Transpower New Zealand (Submitter 805)

Submitter

**MEMORANDUM OF COUNSEL ON BEHALF OF PETER RAYMOND
ARNOTT AND MARGARET MARY ARNOTT**



GTODD LAW
3rd Floor, 36 Shotover Street
Queenstown 9300
PO Box 124
Queenstown 9348
T 03 441 2743
F 03 441 2976
Email: graeme@gtoddlaw.com
Solicitors: G Todd

May it please the Hearings Panel:

1. This submission is filed by Peter Raymond Arnott and Margaret Mary Arnott (the "Arnotts") who are the registered proprietors of a property located at 111 Frankton-Ladies Mile, State Highway 6, near Frankton.
2. The said property is located immediately adjacent to Transpower New Zealand Limited's ("Transpower") Frankton sub-station.
3. The Arnotts have had their attention drawn to Transpower's memorandum to the Hearings Panel dated the 16 September 2016.
4. With the greatest respect to Counsel for Transpower, there is no jurisdiction for the Hearings Panel to consider the rules proposed in paragraph 3 and 4 of the Memorandum as there is no submission or further submission that seeks such rules and therefore the Arnotts and others who may be affected by such rules have not had the opportunity to respond to such.


Counsel for P R and M M Arnott

19 September 2016

Graeme Morris Todd
Solicitor
Queenstown