

**BEFORE THE QUEENSTOWN LAKES DISTRICT  
COUNCIL**

**IN THE MATTER** of the Resource Management Act  
1991

**AND** in the matter of the Queenstown Lakes Proposed  
District Plan

**AND** in the matter of Hearing Stream 13 - Queenstown  
Mapping

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**MEMORANDUM OF COUNSEL FOR GRANT HYLTON HENSMAN, SHARYN  
HENSMAN & BRUCE HERBERT ROBERTSON, SCOPE RESOURCES LIMITED,  
TROJAN HOLDINGS LIMITED AND GRANT HYLTON HENSMAN & NOEL  
THOMAS VAN WICHEN (#361)**

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**MACALISTER TODD PHILLIPS**

Barristers, Solicitors, Notaries  
3<sup>rd</sup> Floor, 11-17 Church Street  
Queenstown 9300  
P O Box 653, DX ZP95001, Queenstown 9348  
Telephone: (03) 441 0125 Fax:(03) 442 8116  
Solicitor Acting: Jayne Macdonald

INTRODUCTION

## INTRODUCTION

1. We act for Scope Resources Limited, Grant Hylton Hensman, Sharyn Hensman & Bruce Herbert Robertson, Grant Hylton Hensman & Noel Thomas van Wichen and Trojan Holdings Limited (submitter #361).
2. The submitters seek approval for the acceptance of the visibility maps attached to this Memorandum as late evidence.
3. By way of background:
  - (a) The methodology underpinning the visibility maps was included with the s32 report accompanying original submission #361 and was inadvertently not included within that document; and
  - (b) The visibility maps were subsequently referred to in the evidence of Michelle Snodgrass, where the omission has been discovered.

## RELIEF SOUGHT

4. The submitters respectfully request that the attached visibility maps be accepted as late evidence. In my submission, acceptance of this material will not cause any prejudice to any other party and will assist the decision making process and veracity of the evidential material before Council to date with respect to visibility effects of the proposed development.



Jayne Macdonald

Counsel for Grant Hylton Hensman, Sharyn Hensman & Bruce Herbert Robertson, Scope Resources Limited, Trojan Holdings Limited and Grant Hylton Hensman and Noel Thomas Van Wichen

19 June 2017



**LAND OWNERSHIP AND PROPOSED ZONE AREAS**  
**SH 6 VISUAL ASSESSMENT**

Client: SCOPE RESOURCES LTD  
 Date: 11/01/14  
 Drawing No: 4\_A

Drawn: CWB  
 Scale: 1:2500 @ A1  
 1:04/15  
 1:5.XREF @ A3

Designed: NM  
 Date: 7.08.14  
 MISC: 2000 & MSL C

Notes:  
 All dimensions shown are in meters unless otherwise stated.  
 All aspects of this plan are subject to change without notice.  
 All drawings and engineering shall be done in accordance with the relevant standards.  
 All drawings shall be prepared in accordance with the relevant standards.  
 Copyright © 2014 by Scope Resources Ltd.

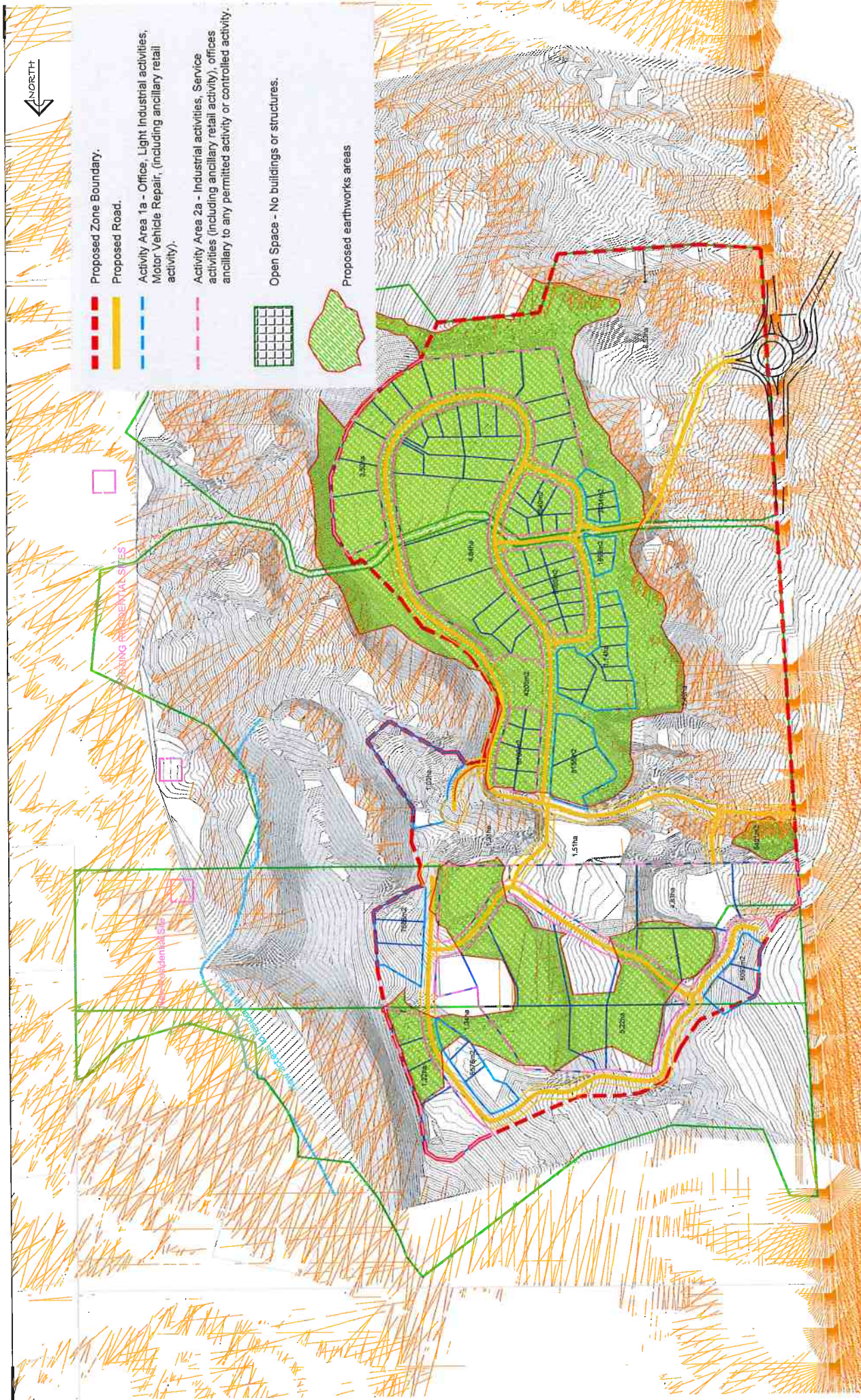
By: [Signature]  
 Title: [Title]  
 Date: [Date]

Revised Details:  
 Rev. Date Description  
 1. 21.01.15 Add earthworks area  
 2. 1.2.15 ACTIVITY AREAS, ROADING PATTERN

Clark Fortune McDonald & Associates  
 309 Lower Shaker Road, P.O. Box 513 Queerstown  
 Tel. (08) 9441-5044, Fax (08) 9442-1066, Email admin@cfma.co.nz

Shop 2, Origo House, 475 Moray Place, P.O. Box 5960  
 Tel. (03) 470-1582, Fax (03) 470-1583, Email admin@cm.co.nz

SC085110001014waad1014\_2C\_VisualAss.dwg Plotdate: 07.07.2015



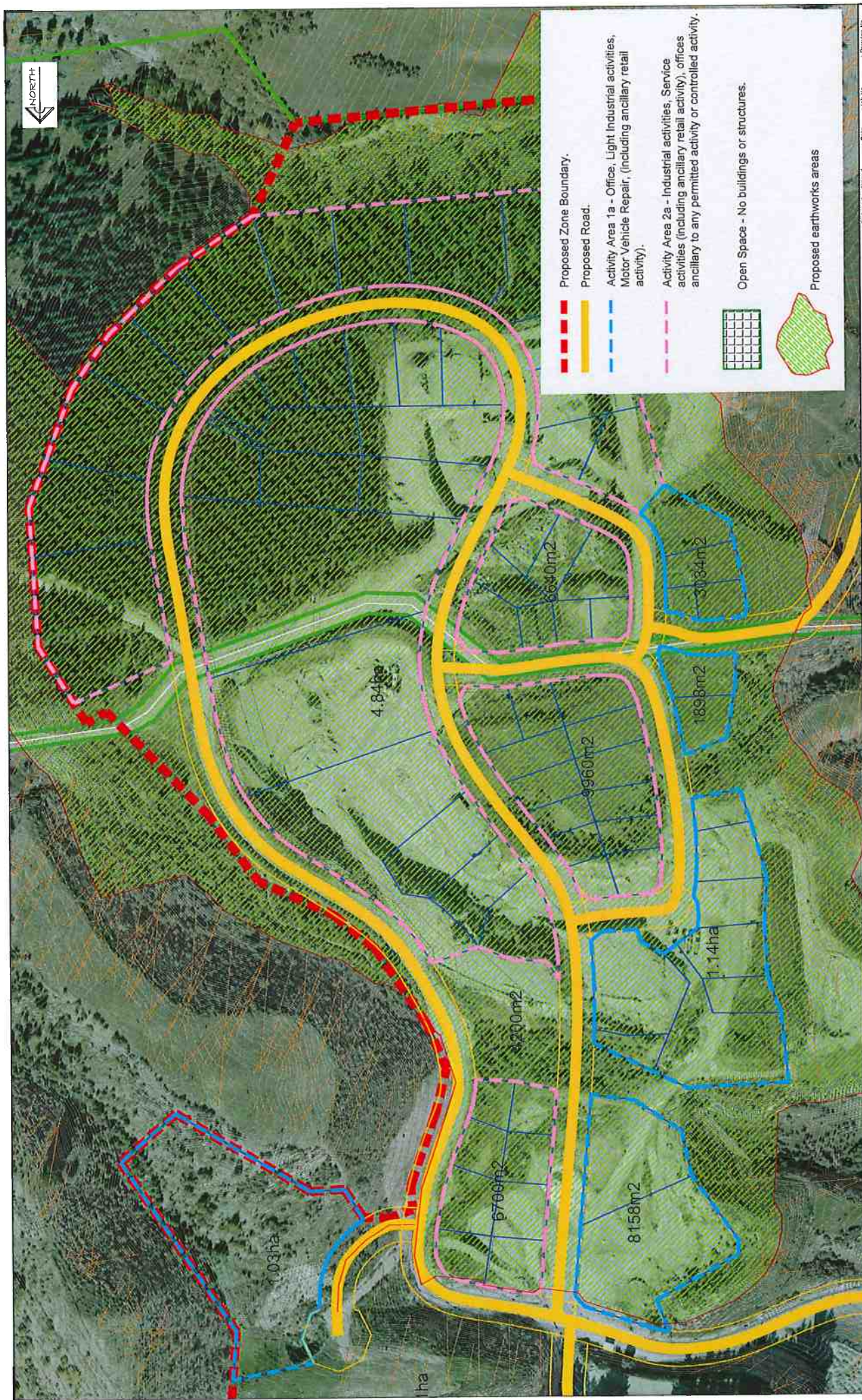
- Proposed Zone Boundary.**
- Proposed Road.**
- Activity Area 1a - Office, Light Industrial activities, Motor Vehicle Repair, (including ancillary retail activity).
  - Activity Area 2a - Industrial activities, Service activities (including ancillary retail activity), offices ancillary to any permitted activity or controlled activity.
  - Open Space - No buildings or structures.
- Proposed earthworks areas**



**SITE PLAN FOR PROPOSED ZONE CHANGE  
YARD BASED, INDUSTRIAL & BUSINESS ZONE  
SH 6 VISUAL ASSESSMENT**

Client	SCOPE RESOURCES LTD	Drawn	CSW	Date	1-04-15	Scale	1:2500 @ A1
Surveyed	Signed	Designed	NM	Date	17-03-15	Drawn & level	1:5 XREF @ A3
Job No.	11014	Drawing No.	4.B				

Rev	Date	Revision Description
B	25.01.15	Add earthworks area
C	1.7.15	Activity Areas, Roading pattern

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 Limited Civil and Structural Engineering - Planning Consultants  
 309 Lower Shovelers Road, P.O. Box 533 Queenstown  
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 Shop 2, Ottago House, 475 Moray Place, P.O. Box 5960  
 Tel. (03)470-1582, Fax (03)470-1583, Email admin@cfma.co.nz



- - - - Proposed Zone Boundary.
- Proposed Road.
- - - - Activity Area 1a - Office, Light Industrial activities, Motor Vehicle Repair, (including ancillary retail activity).
- - - - Activity Area 2a - Industrial activities, Service activities (including ancillary retail activity), offices ancillary to any permitted activity or controlled activity.
-  Open Space - No buildings or structures.
-  Proposed earthworks areas

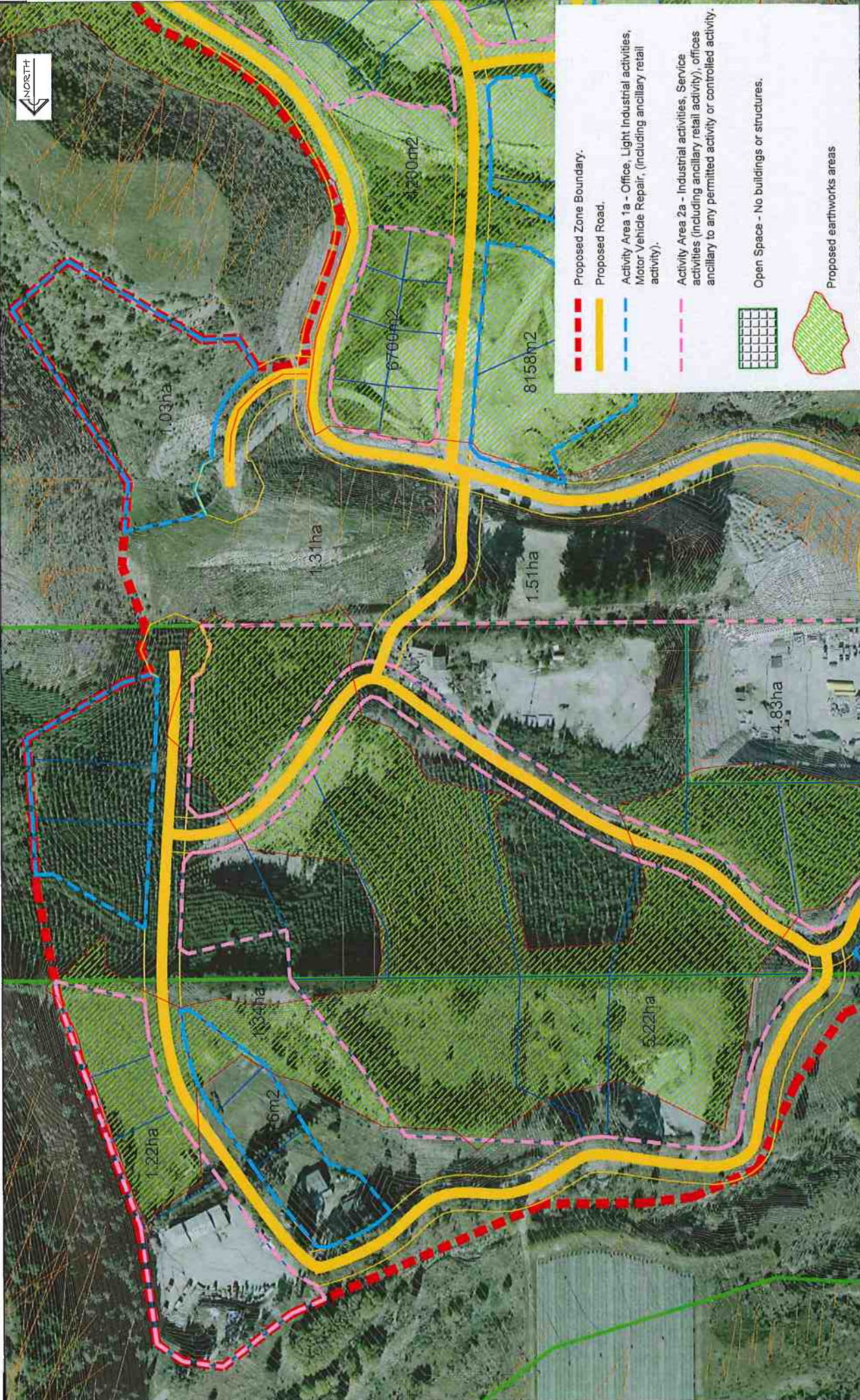
**SITE PLAN FOR PROPOSED ZONE CHANGE  
YARD BASED, INDUSTRIAL & BUSINESS ZONE  
SH 6 VISUAL ASSESSMENT**

Client	SCOPE RESOURCES LTD	Drawn	CSW	Checked	MM	Date	17.03.15	Scale	1:1,000 @ A1 1:2,000 @ A3	Drawing No.	11014_4.C
Surveyed	Signed	Drawn	CSW	Checked	MM	Date	17.03.15	Scale	1:1,000 @ A1 1:2,000 @ A3	Drawing No.	11014_4.C

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**Proposed Zone Boundary.**

**Proposed Road.**

**Activity Area 1a - Office, Light Industrial activities, Motor Vehicle Repair, (including ancillary retail activity).**

**Activity Area 2a - Industrial activities, Service activities (including ancillary retail activity), offices ancillary to any permitted activity or controlled activity.**

**Open Space - No buildings or structures.**

**Proposed earthworks areas**

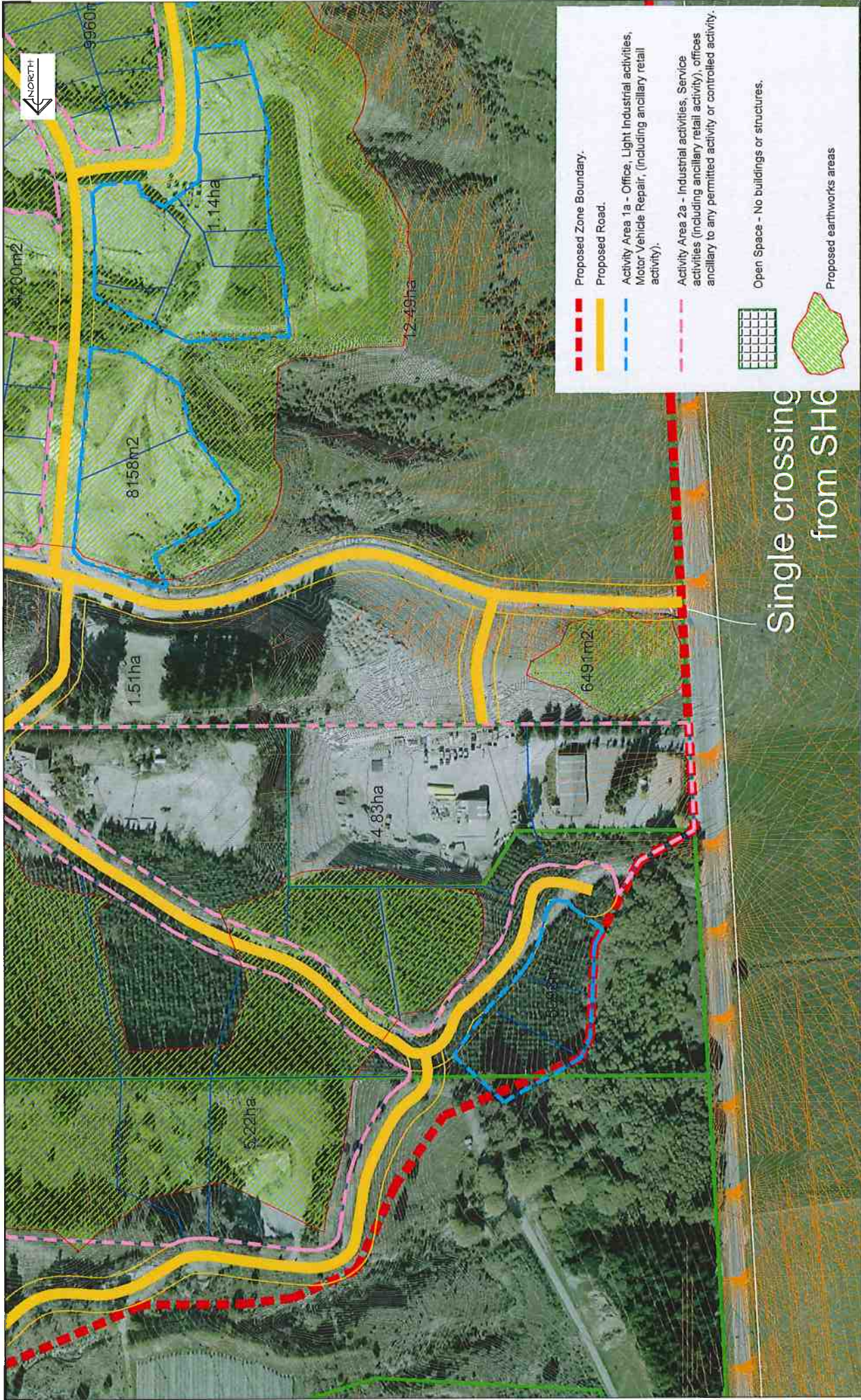
Client	SCOPE RESOURCES LTD		Drawn No.	11014	Drawn Date	4-D
	All dimensions shown are in meters unless otherwise stated. All dimensions shown are in meters unless otherwise stated. All dimensions shown are in meters unless otherwise stated.		Drawn	CRW	Date	1-2-XREF @ A3
	All dimensions shown are in meters unless otherwise stated. All dimensions shown are in meters unless otherwise stated. All dimensions shown are in meters unless otherwise stated.		Designed	MM	Date	17.03.15
	All dimensions shown are in meters unless otherwise stated. All dimensions shown are in meters unless otherwise stated. All dimensions shown are in meters unless otherwise stated.		Checked		Date	17.03.15
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	All dimensions shown are in meters unless otherwise stated. All dimensions shown are in meters unless otherwise stated. All dimensions shown are in meters unless otherwise stated.		Author		Date	17.03.15
	All dimensions shown are in meters unless otherwise stated. All dimensions shown are in meters unless otherwise stated. All dimensions shown are in meters unless otherwise stated.		Client		Date	17.03.15

### SITE PLAN FOR PROPOSED ZONE CHANGE YARD BASED, INDUSTRIAL & BUSINESS ZONE SH 6 VISUAL ASSESSMENT

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 Limited  
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Project: SH 6 Visual Assessment  
 File: SH6\_VisualAssessment\_1014\_24C\_VisualAssessment\_Planetree\_07.07.2015



- Proposed Zone Boundary.
- Proposed Road.
- Activity Area 1a - Office, Light Industrial activities, Motor Vehicle Repair, (including ancillary retail activity).
- Activity Area 2a - Industrial activities, Service activities (including ancillary retail activity), offices ancillary to any permitted activity or controlled activity.
- Open Space - No buildings or structures.
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Single crossing  
from SH6

**SITE PLAN FOR PROPOSED ZONE CHANGE  
YARD BASED, INDUSTRIAL & BUSINESS ZONE  
SH 6 VISUAL ASSESSMENT**

Rev.	Date	Revision Details	By
B	25.06.15	Add earthworks area	CSW
C	17.03.15	Activity Areas, including parking	CSW

**Clark Fortune McDonald & Associates**  
 3001 Lower Shaker Road, P.O. Box 143, Otago Downs  
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 Tel: (03) 470-1582, Fax: (03) 470-1583, Email: admin@cfma.co.nz

Client	SCOPE RESOURCES LTD	Survived	Signed	Date	11.01.14	Job No.	11014	Drawing No.	4-E
Notes:	All dimensions shown are to centre lines unless otherwise stated. All drawings are subject to change without notice. This drawing is a copy of the original and is not to be used for construction purposes. It is the responsibility of the client to ensure that all information is correct and up to date. It is the responsibility of the client to ensure that all information is correct and up to date. It is the responsibility of the client to ensure that all information is correct and up to date.								
Drawn	CSW	Checked	CSW	Date	1.04.15	Date	1.04.15	Date	17.03.15
Scale	1:2,000	Scale	1:2,000	Scale	1:2,000	Scale	1:2,000	Scale	1:2,000