

**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 6, Residential

MEMORANDUM OF COUNSEL FOR MOUNT CRYSTAL LIMITED

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INTRODUCTION

1. This Memorandum requests confirmation that all issues relating to Mount Crystal Limited's original submission be deferred until the mapping hearings in 2017.

BACKGROUND

2. MCL owns a parcel of land on Frankton Road (Lot 1 DP1921) zoned Low Density Residential under the Proposed Queenstown Lakes District Plan ("PDP").
3. MCL made a submission (#150) on the PDP seeking:
 - (a) its land be re-zoned from Low Density Residential to either Medium Density Residential or a mix of Medium Density Residential and High Density Residential; and
 - (b) amendments to the Medium Density Residential and High Density Residential Zone Rules, particularly in respect of building height limits.
4. MCL also lodged a number of further submissions (#1331) both in support of, and opposition to, the original submissions of other submitters.

SPECIFIC ISSUE

5. Council's s 42A Report states that those parts of MCL's submission concerning re-zoning matters have been transferred to the hearing on mapping in 2017. The balance of the submission points concerning zone rule amendment matters are to be heard in Hearing Stream 6: Residential.
6. MCL believes that the relief sought in its submission (and further submissions) concerning re-zoning and zone rule amendments go hand in hand. MCL's preference is therefore that all evidence in respect of its submission (and further submissions) be presented at one hearing.

RELIEF SOUGHT

7. MCL respectfully requests that the consideration of all aspects of its submission (and further submissions) be deferred until the hearing on mapping in 2017.



Jayne Macdonald / Tim Sinclair
Counsel for Mount Crystal Limited

22 September 2016