

**BEFORE THE HEARINGS PANEL
FOR THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN**

IN THE MATTER of the Resource
Management Act 1991

AND

IN THE MATTER of Hearing Stream 10 –
Natural Hazards,
Definitions and Whole
of Plan

**MEMORANDUM OF COUNSEL ON BEHALF OF QUEENSTOWN LAKES DISTRICT
COUNCIL PROVIDING THE LIST OF DEFINITIONS AND SUBMITTERS AS
DIRECTED BY THE PANEL**

Hearing Stream 10 – Natural Hazards, Definitions and Whole of Plan

1 August 2017

 **Simpson Grierson**
Barristers & Solicitors

S J Scott/ C J McCallum
Telephone: +64-3-968 4018
Facsimile: +64-3-379 5023
Email: sarah.scott@simpsongrierson.com
PO Box 874
SOLICITORS
CHRISTCHURCH 8140

MAY IT PLEASE THE PANEL

1. This memorandum is filed by the Queenstown Lakes District Council (**Council**) in response to the Hearings Panel's (**Panel**) Minute concerning definitions dated 28 July 2017. In that Minute the Panel noted the Reply evidence of Ms Amanda Leith where she recommended changes to definitions that had been the subject of previous hearings but where the relevant submitters were not invited to Hearing Stream 10.
2. In response to the Council's suggestion as to how this might be addressed, as set out in the Council's reply legal submissions at paragraphs 4.6 to 4.9, the Panel has requested that the Council supply a list of the definitions and submitters that fall into this category, so that appropriate directions might be made by the Panel.
3. This information is set out in **Appendix 1**.

DATED this 1st day of August 2017



S J Scott / C J McCallum
Counsel for Queenstown Lakes District
Council

APPENDIX 1

LIST OF DEFINITIONS AND SUBMITTERS NOT INVITED TO HEARING STREAM 10

No.	Submitter	Relevant definition(s)
220	Clive Manners Wood	Informal Airport
373	Department of Conservation	Clearance of Vegetation Biodiversity offsets or offsetting No net loss
339	Evan Alty	Clearance of Vegetation Exotic Indigenous Vegetation Nature Conservation Values Margin
344	Fletcher Distribution Ltd and Mico New Zealand Ltd	Building supplier Trade Supplier
784/1030/1091	Jeremy Bell Investments Limited	Consistency Airport Related Activity – Wanaka Airport Clearance of Vegetation Building Nature conservation Values
752	Michael Farrier	Character of Arrowtown
701	Paul Kane	Clearance of vegetation Irrigation Infrastructure Building
84	Richard Hanson	Ski Area Activities
1088	Ross and Judith Young Family Trust	Airport Related Activity – Wanaka Airport
1164	Shotover Park Limited	Trade Supplier Commercial Activity Retail Activity Large Format Retail

649	Southern District Health Board	Community Facility Notional boundary
376	Southern Hemisphere Proving Grounds Limited	Ski Area Activities
315	The Alpine Group Limited	Clearance of Vegetation
791	Tim Burdon	Clearance of Vegetation Indigenous Vegetation Building