Before Queenstown Lakes District Council

In the matter of

The Resource Management Act 1991

And

The Queenstown Lakes District proposed District Plan – Rezoning Hearing Topic 12 – Upper Clutha mapping

SUMMARY STATEMENT OF EVIDENCE OF CHARLES YATES GRANT FOR

Seven Albert Town Property Owners (#1038)

Dated 1 June 2017

Solicitors:

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Qualifications and Experience

- 1 My full name is Charles Yates Grant.
- 2 My evidence dated 28 April 2017 outlines my experience and qualifications relevant to this evidence in respect of the Upper Clutha mapping hearings.

Scope of Evidence

- 3 My evidence addresses the following matters:
 - (a) The relevance of the Township Zone and existing development in determining the boundary of the Clutha River ONF;
 - (b) The relevance of the legal road at Wicklow Terrace in determining the boundary of the ONF;
 - (c) Bank instability in the area identified in the Clutha River ONF extension;
 - (d) The relevance of the flood limits for the Clutha River in determining the boundary of the Clutha River ONF.

Bank Instability

- The terrace referred to by Mr Cutler at this locality is not natural, having been engineered to some degree in response to land instability. These issues are potentially ongoing and further works may be required in the future.
- The GeoSolve Ltd report appended to my rebuttal evidence clearly evidences the fact that there are multiple areas along the banks of the River which may present a hazard of bank instability in the future. An ONF status in these areas could make such necessary works potentially more difficult in the future.
- Ms Mellsop has not considered the formative processes of this area of the river terraces, as evidenced in para 8.119 of her evidence in chief by stating 'the river escarpment in this location is likely to have been at least partially modified'. I understand these terraces to have been modified to a large extent in the past through multiple bank stability works.

Flood Limits

I provided the flood limits from the QLDC hazards database with my evidence to show the extent of the river margins in flood, to the extent that is relevant to determining the extent of the ONF boundary.

Photographic Evidence

I attach to this summary a number of photos of the escarpment which exhibit the modified nature of this area. I hope these will assist the Commissioners to understand from a lay person's perspective, why the notified PDP landscape lines make the most sense on the ground, as well as from a practical point of view.

Dated this 1st day of June 2017

Charles Yates Grant

2734611 Page 3











