

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 2: Rural

**MEMORANDUM OF COUNSEL FOR MILLBROOK COUNTRY CLUB
LIMITED – SUBMITTER NO. 696**

11 July 2016

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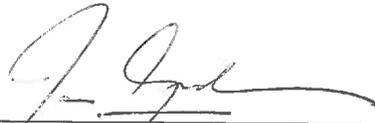
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May it please the Panel:

1. This Memorandum of Counsel is provided on behalf of Millbrook Country Club Limited, a submitter (#696) in support of the PDP Millbrook Resort Zone provisions as notified in response to the Hearing Panel's Minute of 1 July 2016.
2. The PDP as notified makes various map change proposals on that part of the Wakatipu Basin floor presently zoned Millbrook Resort Zone or Rural General, a component of which is a modest expansion of the zone to the west.
3. The proposed Millbrook Resort Zone extension is supported by a s 32 analysis which includes Dr Reid's report of June 2014 together with a more specific and detailed analysis of the relevant landscape unit and its context.¹
4. The issues at the core of the Hearing Panel's Minute relating to Rural Lifestyle Zone are not directly relevant to the proposed extension of the Millbrook Resort Zone for which there is adequate analysis.
5. Millbrook is concerned that issues affecting the Millbrook Resort Zone not be included in any further landscape studies which may result in unnecessary delay to the hearing of issues arising out of the proposed changes to the Millbrook Resort Zone. With respect to the Council's response dated 7 July, Millbrook supports the intent that its forthcoming study would not appraise the Millbrook Zone (para 5).
6. Counsel respectfully suggests that it is unnecessary to undertake the proposed study for that part of the basin covered by the Wharehuanui Landscape Study. That study which formed part of the publically available Section 32 analysis carried out the type of assessment referred to in the Panel's and Council's recent correspondence. It provides an appropriate strategic context for the assessment of Millbrook and much of the surrounding area.

¹ The Wharehuanui Landscape study by Baxter Design Group, April 2015

7. Counsel respectfully submits that the Millbrook Resort Zone issues are sufficiently discrete to be excluded from any wider consideration of character and amenity values of the Wakatipu Basin derived from farming and agricultural activities or by a desire for Rural Lifestyle Zone opportunities in the Basin.



Ian Gordon
Counsel for Millbrook Country Club Limited

// 7 July 2016