

**Before the Panel of Hearing Commissioners  
For the Queenstown Lakes Proposed District Plan**

In the Matter of                      the Resource Management Act 1991

And

In the Matter of                      the Queenstown Lakes Proposed District Plan  
**(Stage 2 – Hearing Stream 14)**

**Memorandum of Counsel for Trojan  
Helmet Limited (Submitter 2387)  
Providing Further Information Requested  
by the Hearings Panel**

Dated: 27 July 2018

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**Lane Neave**  
Level 1, 2 Memorial Street  
PO Box 701  
Queenstown  
Solicitor Acting: Rebecca Wolt  
Email: [Rebecca.wolt@laneneave.co.nz](mailto:Rebecca.wolt@laneneave.co.nz)  
Phone: 03 409 0321

**lane neave.**

**May it Please the Panel**

1. The Panel has requested that by today it be provided with further information from Mr Tyler in respect of:
  - (a) The vegetation taken into account in the visibility mapping undertaken by Mr Tyler, including an indication as to whether the vegetation mapped is protected by the proposed Hills Resort Zone Structure Plan, and if not, an explanation as to why that is the case; and
  - (b) An indicative layout of proposed Activity Areas A4 and A9, if developed to maximum capacity.
2. Mr Tyler has compiled the information requested by the Panel, and it is **attached** to this memorandum.
3. By way of explanation:

*Mapped Vegetation*

- (a) The attached Structure Plan has been annotated to show the location of vegetation taken into account in the visibility mapping, and its height. Where the vegetation is not proposed to be protected by the Structure Plan, a comment is provided alongside it explaining why that is the case.
- (b) The Structure Plan also shows the proposed LAMA (by diagonal hatching) which in some instances (as necessary) corresponds with or will provide comparable screening to the existing vegetation. Generally, where vegetation is not proposed to be protected by the Structure Plan that is because existing topography provides adequate screening.
- (c) For Homesite 3, the conditions of the (recent) consent under which the existing dwelling on that Homesite has been established address the landscaping required to screen or mitigate the effects of that dwelling. In any case, the dwelling located on that Homesite has existing use rights (pursuant to the resource consent), and given the significant investment in the recently established dwelling

(which is the residence of Emma Hill and her family), it is highly unlikely the Homesite will be redeveloped in the future.

#### *Activity Area Layouts*

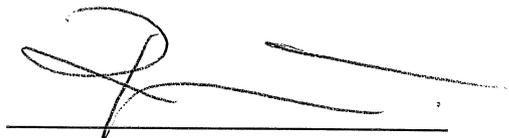
- (d) The indicative development layouts provided for Activity Areas A4 and A9 are based on the maximum permitted yield (as per proposed Rule 44.5.11). Counsel has been unable to confirm with Mr Tyler, but understands, based on his evidence that the building sizes depicted on the indicative layout plans range from approximately 170m<sup>2</sup> – 350m<sup>2</sup>.

#### **Photo Montages**

4. Mr Tyler is presently liaising with Ms Gilbert in respect of the additional photo montages requested by the Panel for proposed Homesites 4 and 5 and will provide these montages to the Panel, along with A3 hardcopies of the montage included in Mr Tyler's evidence, by Monday 6 August, as per the Panel's request.

#### **Hills Resort Zone Provisions - Outstanding Information**

5. Yesterday counsel filed an amended set of Hills Resort Zone Provisions and indicated there were two matters (visibility of activity areas, as per proposed Policy 44.2.1.8(e), and Otago datum for building heights, as per Rule 44.5.3) which required confirmation by Mr Tyler. Unfortunately, at the time of filing this memorandum, counsel has been unable to make contact with Mr Tyler to confirm this information (noting Ms Pfluger is currently uncontactable in Austria). If this information becomes available today, counsel will advise the Panel accordingly.



Rebecca Wolt

**Counsel for Trojan Helmet Limited**

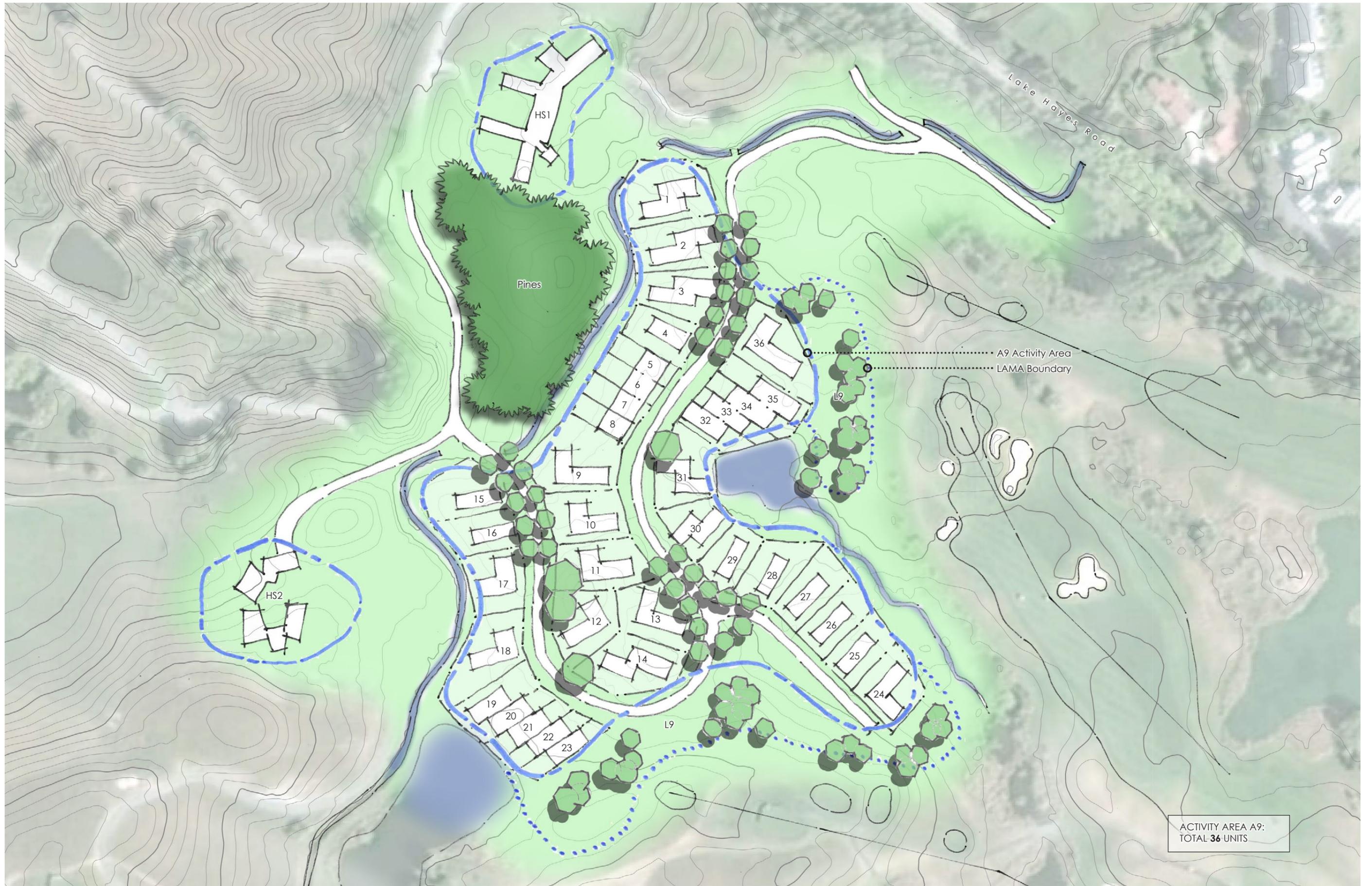
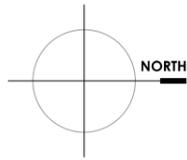


FIGURE 5.0: Activity Area A9: Indicative Scheme Plan



LAMA Earth shaping & planting (Indicative)

ACTIVITY AREA A4:  
TOTAL 29 UNITS



**Structure Plan Overlays:**

-  Landscape Amenity Management Area
-  Existing Vegetation to be retained for Landscape Amenity Management

Areas of existing vegetation included within ZTV mapping:

-  2m High
-  5m High
-  10m High
-  15m High
-  20m High
-  25m High
-  30m High

Explanations noted on plan as to why other areas of existing vegetation are not included within LAMA areas

