

BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL HEARINGS PANEL

UNDER

the Resource Management Act 1991

IN THE MATTER

of the review of parts of the
Queenstown Lakes District Council's
District Plan under the First Schedule of
the Act

AND

IN THE MATTER

of submissions by A Hutchinson (228)
D Gallagher (233), G Sim (235),
N T McDonald Family Trust (411) &
Clark Fortune McDonald & Associates
Ltd (414)

SUBMISSIONS OF COUNSEL

**CHAPTER 21 – RURAL AND CHAPTER 22 – RURAL RESIDENTIAL AND RURAL
LIFESTYLE**

Dated 18th May 2016

MAY IT PLEASE THE COMMISSIONERS

- 1 My name is Neil Thomas McDonald. I have been a practising surveyor in the Lakes District for 29 years. I am the Principal of Clark Fortune McDonald and Associates and trustee for the NT McDonald Family Trust. I am appearing today as Counsel for submitters referenced on the covering sheet.
- 2 Rules 21.4.6 and 22.5.12.1 are not supported by their respective section 32 evaluation reports. The restriction to only construct one residential unit within an approved residential building platform has been introduced into the Proposed Plan without sufficient and comprehensive analysis.
- 3 Policies 22.5.12.1 & 22.5.12.3 (average rules) were introduced for the subdivision of land holdings in the 'Dalefield Zone'.
- 4 The reasons which lead to the conception of these policies is no longer apparent in the Rural Lifestyle zones today.
- 5 The averages rules have been carried over from the operative plan to the proposed plan without critical analysis within the section 32 evaluation report.
- 6 I do not consider these policies represent holistic subdivision of the land any longer.

Neil McDonald

Counsel for A Hutchinson (Submitter 228) D Gallagher (Submitter 233) G Sim (Submitter 235) N T McDonald Family Trust (Submitter 411) and Clark Fortune McDonald & Associates Ltd (Submitter 414)

18th May 2016