

**BEFORE COMMISSIONERS APPOINTED BY  
QUEENSTOWN LAKES DISTRICT COUNCIL**

**IN THE MATTER** of Resource Management Act 1991

**AND**

**IN THE MATTER** of submission of **Hearing Stream 12**

**Jeremy Bell Investments Limited**

OS 782 and OS 820

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**MEMORANDUM OF COUNSEL  
FOR JEREMY BELL INVESTMENTS LIMITED  
OS 782 AND OS 820**

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**GALLAWAY COOK ALLAN  
LAWYERS  
DUNEDIN**

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**MAY IT PLEASE THE COMMISSIONERS**

1. Jeremy Bell Investments Limited made two separate submissions in relation to the Upper Clutha Mapping hearings (stream 12):
  - (a) Original submission 782 seeking re-zoning of land adjacent to State Highway 6 opposite Wanaka Airport.
  - (b) Original submission 820 seeking re-zoning of certain land on Criffel Station from Rural to Rural Lifestyle zone.
2. The submitter intends to call evidence and be heard in respect of both original submissions.
3. Jeremy Bell Investments Limited has been allocated nearly a full hearing day on Tuesday the 13th of June. The hearing timetable records that hearing as being entirely for submission 782. However for the Commission's benefit it is expected that approximately half of that time will be occupied with hearing submission 782, and the other half will be occupied with hearing submission 820. There are separate expert witnesses in relation to each.
4. The expert witnesses in respect of submission 820 will be:
  - (a) Mr Ben Espie (landscape); and
  - (b) Mr Carey Vivian (planning).
5. The evidence to be called in respect of submission 782 will be:
  - (a) Mr Jeff Brown (planning);
  - (b) Mr Andy Carr (transportation);
  - (c) Michelle Snodgrass (landscape);
  - (d) Mr Jerry Bell (farming).
6. Although two submissions are to be heard instead of one as indicated in the hearing timetable, it is expected that both submissions can be fully heard comfortably within the time allocation on the 13th of June.



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**P J Page**

Counsel for Jeremy Bell Investments Limited

Dated: 4 April 2017