

Before the Panel of Hearing Commissioners

In the Matter of the Resource Management Act 1991

And

In the Matter of the Queenstown Lakes District Council Proposed District
Plan (**Proposed Plan**)

Memorandum of Counsel for Queenstown
Airport Corporation Limited

Dated: 22 March 2016

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141 Cambridge Terrace
PO Box 13149
Christchurch
Solicitor Acting: Joshua Leckie
Phone: 03 379 3720
Fax: 03 379 8370

MAY IT PLEASE THE PANEL:

1. In accordance with the Panel's directions, please find **enclosed** for lodgement the following documents in respect of the relief sought by QAC on chapters 3 and 4 of the Proposed Plan:
 - (a) Expert Conferencing Statement; and
 - (b) Section 32AA Evaluation
2. The Planners undertook expert conferencing in relation to these matters on Friday, 18 March 2016 from 11.30am until 1.30pm. Substantial agreement was reached.
3. Unfortunately, Counsel were only made aware of the Council's redrafted Strategic Directions objectives (**New SD Objectives**) dated 18 March 2016 at the hearing yesterday, being 21 March 2016. It is our understanding that most other parties were only made aware of the new SD objectives when they were notified by email at 5.30pm yesterday by the Hearings Panel Administrator.
4. Counsel understands that the agreements reached at expert conferencing are unlikely to be materially impacted by the new SD objectives. However, as these have not been considered at expert conferencing it may be appropriate for the affected parties to provide comments on the new SD objectives to establish whether further expert conferencing or mediation is required. We await the Panel's directions on this point.

Dated this 22nd day of March 2016



R Wolt / J M G Leckie

Counsel for the Queenstown Airport Corporation Limited