

**Before the Queenstown Lakes District Council**

In the Matter of                      the Resource Management Act 1991

And

In the Matter of                      the Queenstown Lakes Proposed District Plan

**Memorandum of Counsel for Queenstown  
Airport Corporation Limited (Submitter  
433 and Further Submitter 1340)  
Requesting Leave to File Late Further  
Submission in respect of Chapter 30  
(Energy and Utilities) of the Proposed  
District Plan**

Dated: 7 March 2016

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1. Queenstown Airport Corporation (**QAC**) has made submissions and further submissions on Stage 1 of the Proposed Queenstown Lakes (**Proposed Plan**) (Submitter 433 and Further Submitter 1340).
2. In general terms, QAC considers it has an interest in the Proposed Plan that is greater than the interest the general public has by virtue of its responsibilities in relation to the management and operation of Queenstown Airport, and its management of Wanaka Airport. Both Airports are regionally significant infrastructure which make a significant contribution to the social and economic wellbeing of the community, and to public health and safety.
3. More specifically, QAC considers it has an interest in Proposed Chapter 30, Utilities and Energy, by virtue of the fact it is a 'network utility operator' under section 166 of the Resource Management Act.
4. By way of this memorandum, QAC respectfully requests leave to file a late further submission in respect of Chapter 30, Utilities and Energy, as set out the **attachment** to this memorandum.
5. QAC considers there will be no prejudice to any party if its late further submission is accepted, because the hearing of submissions on the Chapter are not scheduled to commence until later this year, and no section 42A reports have yet been prepared. The original submitters and Reporting Officers will therefore have ample time in which to consider and respond to QAC's late further submission. Furthermore, the further submission generally supports of the original submissions and does not raise any new issues.
6. QAC confirms it will provide a copy of its late further submission to the relevant original submitters as soon as possible (and within 5 working days) following confirmation from the Hearings Panel that its late further submission is accepted.



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R Wolt  
Counsel for Queenstown Airport Corporation Limited