

**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  
**Chapter 7 (Low Density Residential Zone) and**  
**Chapter 27 (Subdivision)**

**Memorandum of Counsel for Queenstown  
Airport Corporation Limited (Submitter 433 and  
Further Submitter 1340)**

Dated: 21 September 2016

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**MAY IT PLEASE THE PANEL:**

1. This memorandum relates to the upcoming hearing of submissions on Chapter 7 (Low Density Residential Zone) of the Proposed District Plan (**Proposed Plan**).
2. At the hearing of QAC's submissions on Chapter 27 (Subdivision) of the Proposed Plan,<sup>1</sup> the Panel advised that some of QAC's submission points on the Chapter would be deferred to the relevant zone hearing.<sup>2</sup>
3. Specifically, the Panel advised that QAC's submissions on proposed Rules 27.5.1, 27.5.2 and 27.5.3 would be deferred to the hearing of submissions on Chapter 7 (Low Density Residential Zone).
4. However, having reviewed the Section 42A report<sup>3</sup> for the Chapter 7 hearing, it appears that these submission points have not been addressed in that report.<sup>4</sup>
5. Accordingly, QAC respectfully seeks clarification from the Panel as to how it intends to address QAC's submission points on Chapter 27, as identified above.

Dated this 21<sup>st</sup> day of September 2016



**R Wolt / A Needham**

Counsel for the Queenstown Airport Corporation Limited

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<sup>1</sup> On 17 August 2016 in Wanaka

<sup>2</sup> This was notwithstanding paragraph 5.1(c) of counsel for QLDC's memorandum dated 12 July 2016, which indicated that QAC's submission points need not be deferred, and the section 42A report for Chapter 27, which made recommendations on those points.

<sup>3</sup> Dated 14 September 2016.

<sup>4</sup> The section 42A report identifies only one submission on Chapter 27 as being deferred to the Chapter 7 hearing,, being 166 (Aurum Survey Consultants).