

**BEFORE COMMISSIONERS APPOINTED ON BEHALF OF THE
QUEENSTOWN LAKES DISTRICT COUNCIL**

IN THE MATTER the Resource Management Act
1991

AND

IN THE MATTER of the Queenstown Lakes
Proposed District Plan

AURORA ENERGY LIMITED

Submitter OS635

**MEMORANDUM OF COUNSEL FOR AURORA LIMITED REQUESTING
LEAVE TO FILE LATE EVIDENCE AND LEGAL SUBMISSIONS IN
RESPECT OF CHAPTER 27 OF THE PROPOSED DISTRICT PLAN AND
FOR AURORA'S WITNESS TO ATTEND THE HEARING VIA VIDEO
CONFERENCE**

**GALLAWAY COOK ALLAN
LAWYERS
DUNEDIN**

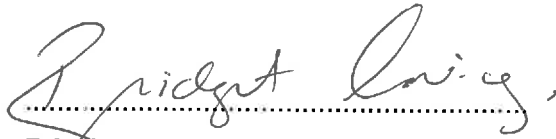
Solicitor on record: Bridget Irving
Solicitor to contact: Bridget Irving
P O Box 143, Dunedin 9054
Ph: (03) 477 7312
Fax: (03) 477 5564
Email: bridget.irving@gallowaycookallan.co.nz

MAY IT PLEASE THE COMMISSIONERS:

1. Aurora made submissions and further submissions on Chapter 27 of the Proposed Queenstown Lakes District Plan. These submissions related to the protection of its distribution assets throughout the region. As part of those submissions Aurora sought that restrictions be imposed on subdivision activity that may impact on its infrastructure, in particular, its Regionally Significant or Critical infrastructure.
2. The section 42A report in relation to Chapter 27 – Subdivision includes a number of recommendations that affect Aurora. Aurora considers it is necessary to file evidence and legal submissions to address those matters. Ms Dowd will be preparing this evidence. Ms Dowd previously presented evidence in relation to the Strategic Directions provisions. As the Panel is aware Ms Dowd was recently involved in a car accident. She is recovering well but is still working part time and has limited ability to travel long distances.
3. Further to the above the Dunedin City district plan review (“2GP”) is occurring concurrently with the QLDC plan review. Hearings for the network utilities chapter are currently taking place. As a result Ms Dowd’s attention has been on evidence and preparation for this hearing. Due to this clash Ms Dowd has been unable to commence preparation of evidence for Chapter 27 of the QLDC plan change.
4. Therefore Aurora respectfully seeks leave to file evidence and legal submissions by 12pm on 3 August 2016. It is requested that Aurora be given a hearing slot of 30 minutes on 17 August and that the Panel consider allowing Ms Dowd to join the hearing via video conference to avoid the need for Ms Dowd to travel. Counsel will be available to attend in person.

5. Aurora thanks the Panel for its consideration.

Date: 19 July 2016

A handwritten signature in cursive script, appearing to read "B. Irving", written over a horizontal dotted line.

B Irving

Counsel for Aurora Energy Limited