Before the Queenstown Lakes District Council

Under the Resource Management Act 1991

And

In the matter of the Queenstown Lakes Proposed District Plan Stage 3 -

Stream 18 – Hawea Settlement Zone

Memorandum of counsel

7 August 2020

Submitter's solicitors:

Maree Baker-Galloway
Anderson Lloyd
Level 2, 13 Camp Street, Queenstown 9300
PO Box 201, Queenstown 9348
DX Box ZP95010 Queenstown
p + 64 3 450 0700 | f + 64 3 450 0799
maree.baker-galloway@al.nz



May it please the Commissioners

1 This memorandum summarises matters following on from the hearing.

Legal Submissions

The Chair requested the references in the section 32 report to the option of UGB expansion at Hāwea. Those references are paragraph 9.22 and Option 4 of Table 11 at pages 49 – 62.

Commercial Zones - Area

- The Chair requested the areas of the Three Parks Commercial Zone, the Wanaka Town Centre Zone and the Cardrona Local Shopping Centre Zone. In response we provide the following information:
 - (a) As per Fraser Colegrave's evidence in chief for the council on Three Parks Commercial, the Three Parks Commercial Zone was 16ha in area in the ODP and is proposed as 11ha in area in the PDP. This area is sought to be increased to 18ha through a submission, to fix a mistake from the notified version.
 - (b) The Wanaka Town Centre Zone is approximately 14ha gross area (including roads), as measured from the PDP online mapping tool;
 - (c) The Cardrona Local Shopping Centre Zone is approximately 1.2ha gross area (no roads), as measured from the PDP online mapping tool.

Intersection Upgrades

- 4 Mr Carr and Mr Rossiter are in discussion about Mr Carr's "proof of concept" figures, as to whether Mr Rossiter agrees that the nature and scale of the upgrade required will:
 - (a) Fit with the legal road at the Domain/Cemetery Road intersection; and
 - (b) Fit within the area currently used as road at the Doman/Capelle Ave Intersection (noting the road land is owned by Contact Energy).

Dated this 7th day of August 2020

Marce Ball - Gallowy

2002797 | 5356848v1 page 1

Maree Baker-Galloway/
Counsel for Universal Developments Hawea Limited

2002797 | 5356848v1 page 2