

**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 21 (Rural)**

**Memorandum of Counsel Requesting  
Leave to File Supplementary Evidence for  
Queenstown Airport Corporation Limited  
(Submitter 433 and Further Submitter  
1340)**

Dated: 18 May 2016

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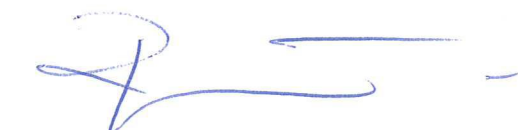
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### May it Please the Panel

1. By way of this memorandum, Queenstown Airport Corporation Limited (**QAC**) seeks the Panel's leave to lodge supplementary evidence in relation to its submission on Chapter 21 (**Rural**) of the Proposed Queenstown Lakes District Plan (**Proposed Plan**).
2. Specifically, leave is sought to file the **attached** supplementary planning evidence of Kirsty O'Sullivan, dated 18 May 2016, addressing Wanaka Airport related issues.
3. The issues addressed in Ms O'Sullivan's supplementary evidence arose during the presentation of QLDC's opening (evidence and legal submissions) in relation to QAC's submission on Chapter 21 of the Proposed Plan.
4. The issues relate to:
  - (a) The proposed prohibition of certain activities within the proposed Runway End Protection Areas (**REPA**) at Wanaka Airport, including the evidential basis for the relevant proposed rule. This evidence directly responds to paragraph 4.21 and 4.22 of QLDC's opening legal submissions (dated 2 May 2016).
  - (b) The planning regime for Wanaka Airport. This evidence directly responds to questions put by the Panel to the section 42A reporting officer, Mr Barr, which the Panel foreshadowed would also be put to QAC's planning witness. Specifically, what a 'good' planning regime is to address Wanaka Airport issues: an overlay, a subzone, or a Wanaka Airport specific zone.
  - (c) A map showing the spatial extent of the proposed REPA.
5. It is noted that this supplementary evidence could be presented orally at the hearing of QAC's submission (on 23 May 2016, at 12pm), however it is considered preferable to pre-lodge a written statement ahead of that, so to enable the Panel sufficient time to properly consider Ms O'Sullivan's opinions and formulate any further questions for her.

6. For the avoidance of doubt, the intention of pre-lodging this evidence is to assist the Panel.
7. It is submitted that no party will be prejudiced by allowing pre-lodgement of Ms O'Sullivan's supplementary evidence, noting the very point of pre-lodging is to enable the Panel and parties adequate time to review and consider it ahead of the supplementary evidence hearing of QAC's submission.



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**R Wolt**  
**Counsel for Queenstown Airport Corporation Limited**