

**BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL HEARINGS PANEL**

**UNDER** the Resource Management Act 1991

**IN THE MATTER** of the review of parts of the Queenstown Lakes District Council's District Plan under the First Schedule of the Act

**AND**

**IN THE MATTER** of submissions and further submissions by **REMARKABLES PARK LIMITED**

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**MEMORANDUM OF COUNSEL FOR REMARKABLES PARK LIMITED, QUEENSTOWN  
AIRPORT CORPORATION AND THE QUEENSTOWN LAKES DISTRICT COUNCIL**

**HEARING STREAM 13 – QUEENSTOWN MAPPING**

**19 MAY 2016**

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**BROOKFIELDS  
LAWYERS**

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**AUCKLAND**

**MAY IT PLEASE THE PANEL:**

1. This memorandum responds the "Minute Regarding Memorandum of Counsel for Queenstown Airport Corporation Limited Dated 11 May 2017".<sup>1</sup>
2. Counsel for Remarkables Park Limited (**RPL**), Queenstown Airport Corporation Limited (**QAC**) and Queenstown Lakes District Council (**QLDC**) have discussed the issues that have been raised by the QAC. As a result of those discussions, the parties advise that:
  - (a) RPL does not seek to call any further evidence or make any further legal submissions in respect of its submission in opposition to the proposed extension of the Airport Mixed Use Zone. It is content with the case it presented at the Chapter 17 hearing in December 2016 in relation to the proposed extension of the Airport Mixed Use Zone;
  - (b) QAC does not seek to call any further evidence or make any further legal submissions in respect of the proposed extension of the Airport Mixed Use Zone. It considers full cases were presented at the Chapter 17 hearing in December 2016 in relation to the proposed extension of the Airport Mixed Use Zone; and
  - (c) Given the above, QLDC will not provide any further comment or analysis on the proposed extension of the Airport Mixed Use Zone in its section 42A reportage on the Hearing Stream 13 submissions.
3. The parties respectfully request that the Panel make its decision on the proposed extension of the Airport Mixed Use Zone on the basis of the information it received as part of the Chapter 17 hearing in December 2016.
4. This approach removes the need for the orders sought by counsel for the QAC. We trust the above is acceptable to the Panel.

**Dated the 19<sup>th</sup> day of May 2017**



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J.D Young

Counsel for Remarkables Park Limited

<sup>1</sup> Dated 15 May 2017.



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R Wolt / J Leckie

Counsel for Queenstown Airport Corporation Limited

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S Scott

Counsel for Queenstown Lakes District Council

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R Wolt

Counsel for Queenstown Airport Corporation Limited

A handwritten signature in black ink, appearing to read 'S Scott', positioned below the text of the Queenstown Airport Corporation Limited counsel.

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S Scott

Counsel for Queenstown Lakes District Council