

**In the Environment Court  
at Christchurch**

**ENV-2018-CHC-093**

**In the Matter**

of the Resource Management Act  
1991(**Act**)

**And**

**In the Matter**

of the Queenstown Lakes Proposed  
District Plan – Stage 1

**And**

**In the Matter**

An appeal under clause 14(1),  
Schedule 1 of the Resource  
Management Act 1991

**Between**

Queenstown Airport Corporation  
Limited

**Appellant**

**And**

Queenstown Lakes District Council

**Respondent**

**Memorandum of Counsel for  
Queenstown Airport Corporation  
Limited in respect of Topic 6:  
Residential, Subtopic 1**

Dated: 1 February 2019

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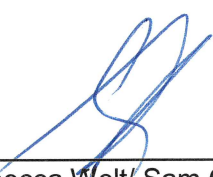
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**May it please the Court:**

1. We act for Queenstown Airport Corporation Limited (**QAC**) in relation to the appeals on Stage 1 of the Proposed Queenstown Lakes District Plan (**Proposed Plan**).
2. QAC's notice of appeal seeks, inter alia, that Rule 7.5.11 in Chapter 7<sup>1</sup> of the Proposed Plan be amended as follows:<sup>2</sup>

*The Maximum site density shall be one residential unit ~~or dwelling~~ per 300m<sup>2</sup> net site area.*
3. The Queenstown Lakes District Council (**QLDC**) has previously advised the Court that it considers QAC's requested relief in respect of Rule 7.5.11 is necessary to correct a "minor text error", that the amendment has "no substantive effect", and that it has therefore been made using QLDC's powers under Clause 16 of the First Schedule to the Act.<sup>3</sup>
4. QAC confirms that the QLDC's amendment under Clause 16 addresses QAC's relief in respect of Rule 7.5.11 in full.
5. Accordingly, QAC withdraws the relief sought in paragraph 18(e)(ii) of its notice of appeal in respect of Rule 7.5.11.

Dated this 1<sup>st</sup> day of February 2019



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Rebecca Volt/ Sam Chidgey

Counsel for Queenstown Airport Corporation Limited

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<sup>1</sup> Lower Density Suburban Residential Zone.

<sup>2</sup> Page 9, paragraph 18(e)(ii) of QAC's notice of appeal.

<sup>3</sup> Refer to QLDC's memorandum of counsel dated 2 October 2018, paragraphs 20-22.