

**BEFORE THE INDEPENDENT HEARING PANEL APPOINTED BY THE  
QUEENSTOWN LAKES DISTRICT COUNCIL**

**UNDER** the Resource Management Act 1991 (RMA)  
**IN THE MATTER** of the Te Pūtahi Ladies Mile Plan Variation in accordance  
with section 80B and 80C, and Part 5 of Schedule 1 of the  
Resource Management Act 1991.

---

**MEMORANDUM OF COUNSEL ON BEHALF OF QUEENSTOWN LAKES  
DISTRICT COUNCIL  
24 April 2024**

---

---

PO Box 323 QUEENSTOWN 9348  
Tel +64 3 379 7622  
Fax +64 3 379 2467

**WYNN WILLIAMS**

Solicitor: L F de Latour | K H Woods  
(kate.woods@wynnwilliams.co.nz)

**MAY IT PLEASE THE HEARING PANEL**

- 1 We refer to the Hearing Panel's Minute dated 22 April 2024 requesting two minor changes to the updated Structure Plan provided on 17 April 2024.
- 2 We file with this memorandum the updated Structure Plan with the following requested changes included:
  - (a) the short southern "Landscape Buffer" on Sub-Area K3 removed; and
  - (b) a black circle ("Proposed Intersection") included at the Stalker Road / State Highway 6 intersection.
- 3 For completeness, in relation to the Stalker Road / State Highway 6 intersection, we note:
  - (a) The black circle ("Proposed Intersection") at the Stalker Road / State Highway 6 intersection was inadvertently left off the Structure Plan provided with Council's s42A reply report and the most recent updated Structure Plan in line with the Hearing Panel's recommendations.
  - (b) It was not included on the notified version of the Structure Plan because, at that stage, there were no rules requiring the upgrade of the existing Stalker Road / State Highway 6 intersection to a signalised intersection. This was first suggested in the evidence of the Mr Dave Smith on behalf of Waka Kotahi NZTA, and subsequently recommended to be included in provisions by the Council's witnesses (Mr Shields and Mr Brown).
  - (c) In the Structure Plan filed with this memorandum, the intersection has been marked with an asterisk (\*). This is to accommodate any changes to the adjoining property boundary geometries and extents of the current intersection road reserves that are likely to be made as part of a new intersection design. It is also consistent with the flexibility noted for other intersections and the "Collector Type A" that will connect into the Stalker Road / State Highway 6 intersection.

**Dated** 24 April 2024

A handwritten signature in blue ink, appearing to read 'L F de Latour / K H Woods', positioned above a horizontal line.

---

**L F de Latour / K H Woods**

Counsel for the Queenstown Lakes District Council