

**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.

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**JOINT MEMORANDUM OF COUNSEL ON BEHALF OF QUEENSTOWN  
LAKES DISTRICT COUNCIL AND ANNA HUTCHINSON FAMILY TRUST**  
17 April 2024

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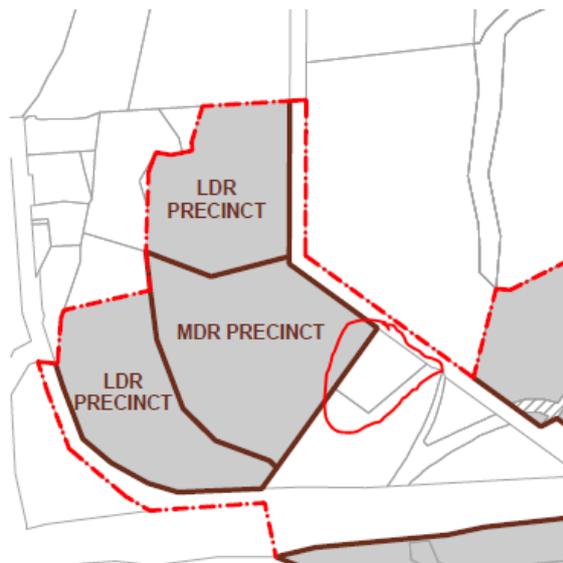
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**MAY IT PLEASE THE HEARING PANEL**

- 1 The Queenstown Lakes District Council (**Council**) and the Anna Hutchinson Family Trust (**AHFT**) wish to advise the Panel of a mapping error in the updated Te Pūtahi Ladies Mile Variation Structure Plan, Building Heights Plan and Zoning Plan filed with the Hearing Panel on 5 April 2024 (and the subsequent updated plans filed on 8 April 2024).
- 2 The parcel of land at 33 Lower Shotover Road (directly northwest of the cemetery) was not shown as being rezoned to TPLM Zone in the updated Variation plans. This is shown in the excerpt from the updated Zoning Plan below (circled in red):



- 3 However, this parcel of land was included in the land sought to be rezoned to TPLM Zone (MDR Precinct) by AHFT, both in its original submission and as shown in the evidence and plans filed by AHFT on 18 December 2023. This is shown in the excerpt from the AHFT Zoning Plan below (circled in red):



- 4 The parties apologise for the oversight, and wish to rectify the situation and provide updated plans to be included in the Hearing Panel's final recommendation report to the Minister.
- 5 The Council has prepared updated Variation plans including this parcel of land in the Zoning Plan, Structure Plan and the Building Heights Plan. These updated plans are filed with this joint memorandum.
- 6 The parties are aware that this is outside the timeframe directed by the Hearing Panel for the Council to provide updated plans in line with the Hearing Panel's recommendations (as part of its comments on the draft recommendation report).<sup>1</sup> However, as the Hearing Panel's final recommendation report has not yet been submitted to the Minister (to best of the parties' knowledge), the parties wished to raise this correction as soon as they became aware.

#### **Direction sought**

- 7 The Council and AHFT respectfully seek that the updated plans filed alongside this memorandum are included in the Hearing Panel's final recommendation report submitted to the Minister.

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<sup>1</sup> Draft Recommendation Report and Recommendations of the Hearing Panel dated 12 March 2024, at 1.14.

**Dated** 17 April 2024



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

Counsel for the Queenstown Lakes District Council



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**J G A Winchester**

Counsel for the Anna Hutchison Family Trust