

**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
5 April 2024**

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Introduction

- 1 We refer to the Panel's Draft Recommendation Report on the Te Pūtahi Ladies Mile Variation (**TPLM Variation**) dated 12 March 2024.
- 2 The Panel requested that Queenstown Lakes District Council (**Council**):
 - (a) Collate all submitter comments, and add their own, and provide a single compiled set of comments on the draft recommendation report and recommended provisions (using the tabulated approach in Appendix 9).¹ The Panel also requested a tracked and clean version of the provisions.²
 - (b) Prepare and provide an updated Structure Plan, Building Heights Plans and Zoning Plan in line with the Panel's recommendations.
- 3 Pursuant to these directions, we file with this memorandum the following documents:
 - (a) A collated set of comments on the draft recommendation report and recommended provisions (using the tabulated approach in Appendix 9). Comments were received from the following submitters: Aukaha, Anna Hutchison Family Trust, Glenpanel Developments Limited, Friends of Lake Hayes, Koko Ridge Limited, Queenstown Country Club, Roman Catholic Diocese of Dunedin, Sanderson Group. The Council has also added their own comments.
 - (b) A tracked version of the Panel's recommended provisions included at Appendix 1 of the draft recommendation report (including suggested changes from submitters and the Council).
 - (c) A clean version of the Panel's recommended provisions included at Appendix 1 of the draft recommendation report (including suggested changes from submitters and the Council).
 - (d) The updated Structure Plan, Building Heights Plans and Zoning Plan in line with the Panel's recommendations.

¹ Draft Recommendation Report and Recommendations of the Hearing Panel dated 12 March 2024, at 1.13(c).

² Draft Recommendation Report and Recommendations of the Hearing Panel dated 12 March 2024, at 1.13(c).

- (e) A table containing the Council's comments on submitters' suggested amendments to the draft updated Structure Plan and Zoning Plan (circulated to submitters on 22 March 2024). Where the Council agrees with the submitters' suggested amendments, these have been included in the updated Structure Plan, Building Heights Plans and Zoning Plan filed with this memorandum.

Dated 5 April 2024



L F de Latour / K H Woods

Counsel for the Queenstown Lakes District Council