

IN THE MATTER

of the Resource
Management Act 1991

AND

IN THE MATTER

of a submission and
further submissions
lodged by **WINTER
MILES AIRSTREAM
LIMITED** in respect of
the **TE PUTAHI LADIES
MILE PROPOSED
VARIATION** to the
Queenstown Lakes
District Plan

**MEMORANDUM OF COUNSEL FOR WINTER MILES AIRSTREAM LIMITED
REGARDING QUESTIONS FOR NATALIE HAMPSON**

QUESTIONS FOR NATALIE HAMPSON

Winter Miles Airstream Limited has the following questions for Ms Hampson:

1. What is preventing the commercial precinct from being dominated by visitor accommodation activity, given it is a permitted activity in the precinct?
2. If half of the commercial precinct was occupied by hotel development, would that result in a shortfall in commercial land to service the Ladies Mile area?
3. Would there be a shortfall in commercial land to service the Ladies Mile area if the number of households was around 3,100 (rather than 2,400)?

Note: There are submissions that seek to extend the area that the Variation applies to.

4. In light of 1 to 3 above, do you still consider that a 2,500m² area of commercial precinct at a neighbourhood scale would have an effect on the commercial precinct that is problematic?
5. If the answer to question 4 is yes, could a small area of precinct on the Winter Miles land have a rule that limits certain commercial activity (such as retailing) to be considered appropriate?
6. At paragraph 37 of your evidence you note that cafés or childcare centres would be permitted activities on the Winter Miles land (HDR Precinct) within appropriate size limits. Please identify the rules that this relates to and comment on whether you consider the sizes provided for in those rules would be viable for those activities?

DATED 17 November 2023



S J Berry / C D H Malone

Counsel for Winter Miles Airstream Limited