

**Before an Independent Hearing Panel of Wellington District Council**

**Under the** Resource Management Act 1991

**In the matter** of the hearing of submissions and further submissions on the Proposed Wellington City District Plan (**PDP**)

**And**

**In the matter** of Hearing Stream 6, Special Purpose Zone and Development Areas

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**MEMORANDUM OF COUNSEL ON BEHALF OF WELLINGTON INTERNATIONAL  
AIRPORT LIMITED**

**Hearing Stream 6 – Airport Zone**

**27 February 2024**

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- 1.1 The Hearings Panel directed expert conferencing in its Minute 43 following my request for an adjournment to enable this to occur following day 1 of the Airport zone hearing on 20 February.
- 1.2 Mr Jeffries, the Council's participant in the planning conference filed the Joint Statement late yesterday afternoon.
- 1.3 The joint statement and associated tracked provisions are limited to discussion about and amendments to AIPZ R3, AIPZ S3 and the definitions of Airport Purposes/Airport Related Activities.
- 1.4 My understanding from Ms O'Sullivan is that Mr Jeffries wished to limit the conference to those matters that he indicated a willingness to conference on in his rebuttal evidence dated 13 February 2024.
- 1.5 This has meant that Ms O'Sullivan's proposed amendments as set out in Appendix B of her Statement of evidence were not able to be considered nor other matters raised by the Panel on day 1 of the Hearing. It is Ms O'Sullivan's understanding that Mr Jeffries wishes to address these matters via his right of reply.
- 1.6 I had not understood the conferencing to be limited in this way and so I have asked Ms O'Sullivan to provide an updated tracked version of the Airport zone provisions which includes additional tracking namely:
  - (a) the agreed amendments set out in the Joint Witness Statement (purple text);
  - (b) those outstanding matters that were set out in Appendix B of her Statement of evidence; and
  - (c) further amendments to address questions raised by the Panel during the Hearing (blue text).
- 1.7 If it would assist the Panel, I will ask Ms O'Sullivan to step through the provisions identified in purple and blue in place of a supplementary statement.
- 1.8 I have also asked Ms Lester to prepare a very short supplementary brief of evidence to provide some further information in response to questions of the Panel.
- 1.9 Both documents are attached to this Memorandum and I will bring copies to the hearing given the timing involved.

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**Amanda Dewar**  
Counsel for Wellington International Airport Ltd