

BEFORE INDEPENDENT COMMISSIONERS

IN THE MATTER of the Resource Management Act
1991 ("RMA")

AND

IN THE MATTER of the Proposed Plan Change 78:
Intensification ("PC78") to the
Auckland Unitary Plan Operative
in Part

**MEMORANDUM OF COUNSEL FOR BOARD OF AIRLINE
REPRESENTATIVES NEW ZEALAND INC RELATING TO
METROPOLITAN CENTRES ZONE HEARINGS**

Dated 11 OCTOBER 2024

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MAY IT PLEASE THE PANEL

1. This memorandum is filed on behalf of the Board of Airline Representatives New Zealand Inc (“BARNZ”) and refers to the memorandum filed yesterday (10 October 2024) in”) on behalf of Auckland International Airport Limited (“Auckland Airport”) in relation to the upcoming hearing on the Metropolitan Centre Zone provisions and Sylvia Park Precinct.
2. BARNZ has lodged submissions seeking relief that is consistent with the relief sought by Auckland Airport as it relates to Airport-related qualifying matters.
3. In its memorandum Auckland Airport advises that its preference is to present its evidence in relation to the Airport-related qualifying matters at one time (as part of the future hearing on qualifying matters). It considers that this would be the most efficient and effective way to address the Panel on these matters, rather than providing evidence on specific points relating to the Metropolitan Centre Zone provisions without the Panel having heard evidence relating to Airport-related qualifying matters more broadly.
4. The Auckland Airport memorandum seeks confirmation from the Panel that:
 - (a) Auckland Airport's case on Airport-related qualifying matters can be presented as part of the future hearing on qualifying matters; and
 - (b) Auckland Airport can address specific matters relating to the Metropolitan Centre Zone (as required) including responding to evidence brought by the Council and / or other submitters as part of this hearing on the Metropolitan Centre Zone provisions, at that later hearing.
5. BARNZ supports Auckland Airport's position and reasoning.
6. Given the similarity of BARNZ's submissions and position on this issue, if the Panel is minded to grant the directions sought by Auckland Airport, it is respectfully requested that the directions are extended to include BARNZ.



G K Chappell
Counsel for BARNZ

Dated this 11th day of October 2024