

**BEFORE THE HEARINGS PANEL  
FOR THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN**

**IN THE MATTER** of the Resource Management Act 1991  
**AND**

**IN THE MATTER** of Stage 2 including variations to Stage 1 of the  
Proposed District Plan

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**MEMORANDUM OF COUNSEL FOR QUEENSTOWN CENTRAL LIMITED  
- SUBMITTER NO. 2460**

**4 May 2017**

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**May It Please The Panel:**

1. This memorandum of counsel is filed on behalf of Queenstown Central Limited (QCL) in respect of its Submission 2460.
2. In its Minute of 16 April 2018 the Panel directed the Council to clarify which parts of Submission 2460 it considers to be not "on" Stage 2 and which parts it consider to be "on" Stage 2.
3. By Memorandum dated 1 May 2018 counsel for the Council responded accordingly with reasons for its position.
4. QCL accepts the views and reasons now advanced for the Council such that those parts of the submission deemed not "on" Stage 2 can either be struck out under s 41D(b), or held over for consideration (and hearing) in respect of that part of the review process which specifically addresses the Frankton Flats B Zone.
5. By way of explanation, Submission 2460 was prepared and lodged at a time when its author was unaware that the Frankton Flats B Zone was explicitly withdrawn from the PDP on 25 May 2017 but with the intention that it be restored at a later date in a different stage of the process.

**DATED** this 4th day of May 2018



I M Gordon

Counsel for Queenstown Central Limited