

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

IN THE MATTER of the Resource Management
Act 1991

AND

IN THE MATTER of Hearing Stream 8 – Business
Zones and specifically Chapter
15 Local Shopping Centre Zone

**MEMORANDUM OF COUNSEL ON BEHALF OF THE TRUSTEES OF THE GORDON
FAMILY TRUST**

CHAPTER 15 LOCAL SHOPPING CENTRE ZONE

14 December 2016

MAY IT PLEASE THE PANEL

1. This memorandum is filed on behalf of Trustees of the Gordon Family Trust (“The Trust”) to provide the Hearings Panel (“Panel”) with a list of submissions that were made on behalf of the Trust in relation to the Local Shopping Centre Zone.

Submissions Made

2. The Trust made five further submissions opposing submissions made in relation to the Local Shopping Centre Zone. The further submissions were grouped together by the Queenstown Lakes District Council (“Council”) as one further submission (#1193). The submissions were as follows:
 - a. A further submission opposing the submission of Willowridge Developments Limited (#249).
 - b. A further submission opposing the submission of Alpine Estate Limited (#379).
 - c. A further submission opposing the submission of JA Ledgerwood (#507).
 - d. A further submission opposing the submission of Stuart Ian & Melanie Kiri Agnes Pinfold & Satomi Enterprises Limited (#622).
 - e. A further submission opposing the submission of Ian Percy & Fiona Aiken Family Trust (#725).
3. It is noted that the Council has transferred some of the submissions listed to other Hearing Chapters. Part of Submission #249 (Willowridge Developments Limited), Submission #379 (Alpine Estate Limited), Submission #507 (JA Ledgerwood) and Submission #622 (Stuart Ian & Melanie Kiri Agnes Pinfold & Satomi Enterprises Limited)¹ will now be heard in the hearings on Mapping.
4. Submission #725 (Ian Percy & Fiona Aiken Family Trust) is proposed to be heard in the Rural Zone Hearings.
5. Therefore the only submission which still relates to the Local Shopping Centre Zone is part Submission #249 by Willowridge Developments Limited, which seeks a restriction in the nature and scale of commercial activities.² The Trust appeared before the Panel in respect of its further submission filed in opposition to that of Willowridge Developments Limited.

¹ Memorandum of Counsel on Behalf of the Queenstown Lakes District Council Regarding Submissions to be Heard on the Rezoning/Mapping Hearings Chapter 15 Local Shopping Centre Zone Dated 1 December 2016 at page 2

² Section 42A Report – Local Shopping Centre Zone at page 10

Dated this 14th day of December 2016

A handwritten signature in black ink, appearing to read 'GRAEME MORRIS TODD', is written over a horizontal dotted line.

GRAEME MORRIS TODD

Counsel for Trustees of the Gordon Family Trust