

**BEFORE THE QUEENSTOWN LAKES DISTRICT
COUNCIL**

IN THE MATTER of the Resource Management Act
1991

AND in the matter of the Queenstown Lakes Proposed
District Plan

AND in the matter of Hearing Stream 13, Queenstown
and Queenstown Rural

**MEMORANDUM OF COUNSEL FOR DAVID BROOMFIELD (#500), WOODLOT
PROPERTIES LIMITED (#501),
SCOTT CONWAY (#467) AND RICHARD HANSON (#473)**

MACALISTER TODD PHILLIPS

Barristers, Solicitors, Notaries
3rd Floor, 11-17 Church Street
Queenstown 9300

P O Box 653, DX ZP95001, Queenstown 9348
Telephone: (03) 441 0125 Fax:(03) 442 8116
Solicitor Acting: Jayne Macdonald

INTRODUCTION

1. We refer to our Memorandum dated 5 May 2017.
2. By way of correction, the references to original submission point “#500.17” contained at paragraphs 4, 6, 7 and 8 of our Memorandum ought to have read “#501.17”.
3. By way of clarification, original submission #501 was lodged by Mr Broomfield’s company, Woodlot Properties Limited, and not Mr Broomfield personally.



Jayne Macdonald/Tim Sinclair

Counsel for David Broomfield, Woodlot Properties Limited, Scott Conway and Richard Hanson

9 May 2017