

**Before Palmerston North City Council**

**Under** the Resource Management Act 1991

**In the matter of** a proposed plan change to rezone  
land at 611 Rangitikei Line to establish  
the Whiskey Creek Residential Area

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**MEMORANDUM OF COUNSEL FOR FLYGERS INVESTMENT GROUP LIMITED**

**3 AUGUST 2022**

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**Counsel Acting**

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1. In accordance with Minutes 4 and 5 the planning witnesses provided a joint response to the Panel's questions on Friday, 29 July as part of their s32AA evaluation.
2. As will be evident from those documents, there was only one remaining matter of disagreement between the planners, concerning the provisions for multi-unit housing; though the planners had little time to work together to address that issue due to Mr Thomas' overseas travel from 27 July to 9 August.
3. The requestor apprehends that if the planners resume discussions regarding the multi-unit housing provisions when Mr Thomas returns, then it may be possible to provide the Panel with a more refined or updated position before the Panel resumes deliberations. If the Panel agrees, the requestor seeks leave for the planners to take those steps, subject of course to any deadline the Panel considers appropriate in light of the Panel's deliberation schedule.
4. If that course is taken, the requestor will need to reserve its right to file a written reply on the issues to do with multi-unit housing until after the planners' final position is known. However, it will better assist the Panel if a written reply on all other matters is filed in the meantime.
5. As matters stand, the requestor's written reply is due by 5pm today. The requestor seeks a short extension to 5pm tomorrow, to file a written reply on all matters *other than* multi-unit housing, and an extension for its further reply regarding multi-unit housing to a deadline the Panel considers appropriate in light of the Panel's deliberation schedule. From the requestor's perspective, the latter deadline could be the same as for any further material from the planners (per paragraph 3 above).



**M J Slyfield**  
Counsel for Flygers Investment Group Ltd

3 August 2022