

**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 Hearing Stream
03 – Historic
Heritage and
Protected Trees

**MEMORANDUM OF COUNSEL FOR QUEENSTOWN LAKES
DISTRICT COUNCIL REGARDING OPENING ON 27 JUNE 2016**

HEARING STREAM 03 – HERITAGE

13 June 2016

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MAY IT PLEASE THE PANEL:

1. The purpose of this memorandum is to request that the Hearing Panel allocate one full day on Monday 27 June 2016 to the Queenstown Lakes District Council (**Council**), for its opening and presentation of legal submissions, reports and evidence on the Historic Heritage and Protected Trees chapters of the Proposed District Plan (**PDP**).

2. The Council has filed a section 42A report for both chapters, and will also be presenting expert evidence from the following witnesses:
 - 2.1 Mr Richard Knott, in relation to Historic Heritage;

 - 2.2 Mr David Spencer, in relation to Protected Trees;
and

 - 2.3 Mr Philip Blakely, in relation to Character Trees.

3. The Council respectfully considers that additional time to present its opening is required for the following reasons:
 - 3.1 to allow the Council to present a full case explaining the approach taken by the Council and its position on the Historic Heritage and Protected Trees chapters of the PDP;

 - 3.2 the Council is responding to, and providing a position on, all submission points, as opposed to presenting a case on one particular issue or site. The breadth and scope of the information that it seeks to present to the Panel is therefore wider, than for specific submitters; and

3.3 the Council has taken into account the time required to present its opening in the Strategic Direction and Rural hearings, in seeking one full day to present its case.

DATED this 13th day of June 2016

A handwritten signature in blue ink, appearing to read 'Curt', is positioned above a horizontal line.

S J Scott / K L Hockly
Counsel for Queenstown
Lakes District Council