

**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 12 – Upper Clutha  
Mapping

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**MEMORANDUM OF COUNSEL FOR M BERESFORD (SUBMITTER 149) SEEKING  
EXTENSION TO FILE REBUTTAL TO COUNCIL'S DCM SUPPLEMENTARY EVIDENCE**

**Dated 5 May 2017**

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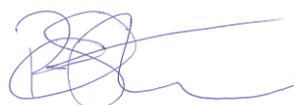
**MAY IT PLEASE THE CHAIR:**

1. This Memorandum is filed on behalf of Submitter 149 Mr Mark Beresford.
2. Following receipt of the Council's supplementary DCM evidence on 1 May 2017, Mr Beresford's expert Natalie Hampson requested some further detail be obtained in relation to the updated DCM, to assist with preparation of her rebuttal evidence to be filed by 1pm Tuesday 9 May.
3. Accordingly, on 2 May 2017, the following request was made to the Council's solicitors by email:

In order to prepare her rebuttal evidence, would it be possible for our witness to be provided with a copy of the updated DCM (Upper Clutha zones only) in a format that identifies capacity growth by zone and location, including an ability to sub-total the UGB. (It does not appear to be in the bundle of referred to documents and her expectation was that she would have table not dissimilar to the DCM 2015 to review.)

4. Following a further email inquiry to the Council's solicitors today as to this request, we have been advised that the information sought should be provided to us on Monday.
5. Under the circumstances, we seek a one day extension to enable Mr Beresford's expert time to consider the data that is being provided on Monday, and then finalise her rebuttal evidence.
6. Accordingly, we seek an extension to **1pm Wednesday 10 May 2017** to file rebuttal evidence from Natalie Hampson.

**Dated** this 5<sup>th</sup> day May 2017.



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**P A Steven QC**  
Counsel for M Beresford (Submitter 149)