

**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 the Rural Hearing
Stream 2 (Indigenous
Vegetation and
Biodiversity chapter)

**MEMORANDUM OF COUNSEL ON BEHALF OF QUEENSTOWN LAKES
DISTRICT COUNCIL SEEKING LEAVE TO FILE SUPPLEMENTARY EVIDENCE
OF GLENN ALISTER DAVIS**

20 APRIL 2016

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MAY IT PLEASE THE PANEL:

1. This memorandum is filed on behalf of the Queenstown Lakes District Council (**Council**) in relation to Rural Hearing Stream 2, and respectfully seeks leave to file supplementary evidence in response to one specific submission point made by James Wilson Cooper (Submission #400).
2. Mr Cooper's submission includes the following relief: *Remove designation E18B from the Submitter's Land*. Consideration of this specific relief was inadvertently omitted from consideration in the section 42A report on the Indigenous Vegetation and Biodiversity chapter, and in Mr Glenn Davis' statement of evidence. Mr Davis is the Council's ecologist witness for the Indigenous Vegetation and Biodiversity chapter.
3. Since filing evidence on 7 April 2016, it has come to Council officers' attention that the submission point has not been considered in the section 42A report or in evidence.
4. The Council respectfully seeks leave to file late supplementary evidence by Mr Davis, to assist the Panel and Mr Cooper by providing the Council's position on whether SNA E18B should be removed from the Schedule of SNAs in Chapter 33. For efficiency reasons, Mr Davis' supplementary evidence is filed at the same time as this application.
5. The Council proposes that an extension of a further 5 working days, for the filing of any evidence on behalf of the submitter on the removal of SNA E18B, would be appropriate. This would ensure that any evidence of the submitter was before the Panel, before the Council opens on Monday 2 May 2016.

DATED this 20th day of April 2016



J G A Winchester / S J Scott
On behalf of Queenstown Lakes District Council