

**BEFORE THE COMMISSIONER APPOINTED ON BEHALF OF
INVERCARGILL CITY COUNCIL**

UNDER The Resource Management Act 1991
(the **Act**)

IN THE MATTER of an application for Resource Consent
to demolish a Category II heritage
building under Heritage New Zealand
Pouhere Taonga (HNZPT) list -
Business 2 & Industrial 1 Zones at 100-
116 Gore Street, Bluff; RMA/2023/72

BETWEEN **BLUFF OYSTER AND FOOD
FESTIVAL CHARITABLE TRUST**

Applicant

AND **INVERCARGILL CITY COUNCIL**

Local Authority

**MEMORANDUM OF COUNSEL ON BEHALF OF BLUFF OYSTER AND
FOOD FESTIVAL CHARITABLE TRUST**



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1. This memorandum of counsel is filed on behalf of the Bluff Oyster and Food Festival Trust who is the applicant for Resource Consent RMA/2023/72 (**Trust / Applicant**).
2. Filed with this memorandum is the Applicant's evidence, comprising:
 - (a) Evidence of Luke McSoriley (Planning);
 - (b) Evidence of Judith (Meg) Back (Landscape);
 - (c) Evidence of John Edminstin (Chair of the Trust).
3. The Application was submitted with the Heritage Impact Assessment authored by Dr Dawn Cropper. That assessment was extensive and there do not appear to be any substantive matters of contention regarding the heritage values of the building or the effects of the proposed demolition itself.
4. In light of that, further evidence has not been prepared by Dr Cropper. However, Dr Cropper can be available (by AVL) on the day of the hearing to answer any questions the Commissioner may have. If it would assist the Commissioner questions could be provided to Dr Cropper prior to the hearing. Otherwise, if there are no questions, then confirmation is sought that Dr Cropper may be excused from attending.
5. Leave is also requested for Ms Back to appear via AVL. Counsel, Mr McSoriley and Mr Edminstin will appear in person.
6. The Notice of Hearing sought an indication of speaking time which Counsel expects to be 2 hours, allowing time for legal submissions, the Applicant's witnesses and any questions arising.

Dated 1 November 2023



S Peirce
Counsel for the Applicant