

BEFORE THE HEARING PANEL

IN THE MATTER of the Resource Management Act 1991

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IN THE MATTER of a submission by Rangitāne Tū Mai Rā Trust and Rangitāne o Wairarapa Incorporated Society on the Proposed Natural Resources Plan for the Wellington Region pursuant to Clause 6 of Schedule 1, Resource Management Act 1991

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IN THE MATTER of Hearing Stream Three – Water Allocation and Natural Form and Function

**MEMORANDUM OF COUNSEL ON BEHALF OF RANGITĀNE TŪ MAI RĀ TRUST AND
RANGITĀNE O WAIRARAPA INCORPORATED SOCIETY**

Dated 22 September 2017

Director
Aidan Warren
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MAY IT PLEASE THE PANEL

1. This Memorandum of Counsel is filed on behalf of Rangitāne Tū Mai Rā Trust and Rangitāne o Wairarapa in relation to the Panel's direction for counsel to provide further submissions in response to questions put by the Panel on the Hearing Stream 3 topics.
2. We advise that counsel is unable to meet the proposed deadline of Friday, 22 September 2017 as requested by the Panel. Accordingly, we seek an extension until **5 pm Friday, 29 September 2017** on the following grounds:
 - (a) Counsel is currently overseas for other work matters and has not had great opportunity to touch base with Sarah Ongley, who presented submissions on behalf of Rangitāne o Wairarapa at Hearing Stream 3;
 - (b) Counsel is touching base with Sarah Ongley early next week to get a better understanding of the request for further submissions; and
 - (c) Due to the remaining hearing streams set down to recommence in February 2018 and the subsequent delay in proceedings, the extension should not cause prejudice to any other parties involved.
3. We also confirm that Aidan Warren is acting on behalf of Rangitāne o Wairarapa in relation to the Greater Wellington Regional Council Proposed Natural Resources Plan. Counsel apologises for any uncertainty caused due to counsel's absence at the presentation of submissions during Hearing Stream 3.

Dated: 22 September 2017



Aidan Warren
Counsel