

**Before the Hearing Panel
at Wellington**

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

IN THE MATTER OF Proposed Natural Resources Plan for the Wellington
Region (Hearing Stream 4)

JOINT MEMORANDUM OF COUNSEL

**On behalf of the Wellington Fish and Game Council, the Minister of
Conservation and Rangitāne Tū Mai Rā Trust**

HEARING STREAM 4 – WATER QUALITY AND STORMWATER

Dated: 23 January 2018

Counsel instructed

For the Wellington Fish and Game Council:
Sarah Ongley
Barrister
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New Plymouth
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- 1 This Memorandum seeks a one week extension of the date for filing planning evidence on the 'Water Quality and Stormwater' topic by Rangitāne Tū Mai Rā Trust ("the Trust"), the Wellington Fish and Game Council and the Minister of Conservation. Evidence is due for pre-circulation on Friday 26 January 2018. These parties seek to file their combined planning evidence by **5.00 pm Friday 2 February 2018**.
2. In line with the approach taken at Hearing Stream 3, the Trust, the Wellington Fish and Game Council and the Minister of Conservation propose to align their planning evidence and present separate but co-ordinated cases. The three parties have sought to be heard in a block at Hearing Stream 4 commencing on Monday 19 February 2018.
3. As at Hearing Stream 3, the parties consider that it will assist the Panel if any amendments sought to the planning provisions for Hearing Stream 4 can, where possible, be jointly put forward by them. This is considered helpful to the Panel as it will avoid the Panel needing to consider slightly different wording proposals by parties that are essentially seeking the same outcome. However this collaboration exercise does require some additional time, including the planning experts considering the separate parties' technical expert evidence.
4. It is respectfully submitted that the delay is unlikely to prejudice any other party. The evidence will still be pre-circulated within the two weeks prior to the hearing of the case for these parties and is likely to be of lesser volume than if the three parties had entirely separate planning evidence on this topic.
5. This request relates to planning (not the technical) evidence for the Water Quality and Stormwater Hearing.

DATED this 23rd day of January 2018



Ms S Ongley

**On behalf of the Wellington Fish and
Game Council**



Ms K Anton
On behalf of the Minister of Conservation



Mr A Warren
On behalf of Rangitāne Tū Mai Rā Trust