BEFORE THE NORTHLAND REGIONAL COUNCIL

IN THE MATTER

ANDIN THE MATTER22 resource consent applications for new
Water Permits for the taking and use of
groundwater and 2 applications for changes
to consent conditions of current Water
Permits from the Waihopo, Houhora, Other,
Motutangi, Waiparera, Paparore,
Waipapakauri, Ahipara, and Sweetwater

of the Resource Management Act 1991

aquifer management sub-units of the

Aupouri Aquifer, Northland

MEMORANDUM OF COUNSEL ON BEHALF OF THE APPLICANTS

DATED 13 May 2021

BROOKFIELDS LAWYERS A M B Green / R H Ashton Telephone No. 09 379 9350 Fax No. 09 379 3224 P O Box 240 DX CP24134 AUCKLAND

May it please the Hearing Panel:

- 1. This memorandum is filed on behalf of the Applicants to seek directions for the closing of this hearing.
- 2. The Applicants have consulted with the Northland Regional Council and the Department of Conservation in relation to an appropriate timetable. The following approach is agreed with those parties:
 - A supplementary s 42A report is to be produced by 28 May 2021 addressing the reporting officers' position in light of the process since the hearing was adjourned and attaching recommended GMCPs and consent conditions.
 - b) Reply submissions from submitters (and any further evidence strictly in reply)
 by 4 June 2021.
 - Applicants' reply submissions (and any further evidence strictly in reply) by 11
 June 2021.
- 3. The parties are in the Hearing Panel's hands as to whether the hearing is reconvened for any questions to be put to counsel and witnesses, or whether the Panel proceeds to close the hearing on the papers. The Applicants note that AVL may be an available option should the Panel have questions of counsel and witnesses.

DATED this 13th day of May 2021

Andrew Green / Rowan Ashton Counsel for the Applicants