

BEFORE THE NORTHLAND REGIONAL COUNCIL

under: the Resource Management Act 1991

in the matter of: Resource consent applications by the Te Aupōuri Commercial Development Ltd, Far North Avocados Ltd, P McLaughlin, NE Evans Trust & WJ Evans & J Evans, P & G. Enterprises (PJ & GW Marchant), MP Doody & DM Wedding, A Matthews, SE & LA Blucher, NA Bryan Estate, SG Bryan, CL Bryan, KY Bryan Valadares & D Bryan (Property No 1), MV Evans (Property No 2), MV Evans (Property No 1), Tuscany Valley Avocados Ltd (M Bellette), NA Bryan Estate, SG Bryan, CL Bryan, KY Bryan Valadares & D Bryan (Property No 2), Tiri Avocados Ltd, Valic NZ Ltd, Wataview Orchards (Green Charteris Family Trust), Mate Yelavich & Co Ltd, Robert Paul Campbell Trust, Elbury Holdings Ltd (C/- K J & F G King) for new groundwater takes from the Aupōuri aquifer subzones: Houhora, Motutangi and Waiharara and applications by Waikopu Avocados Ltd, Henderson Bay Avocados Ltd, Avokaha Ltd (c/- K Paterson & A Nicholson), KSL Ltd (c/- S Shine), Te Rarawa Farming Ltd and Te Make Farms Ltd for increased existing consented takes from the Aupōuri aquifer subzones: Houhora, Motutangi, Sweetwater and Ahipara.

**Memorandum of Counsel for the
Director-General of Conservation
(Timetabling #2)
14 May 2021**

Counsel for the Director-General of Conservation:

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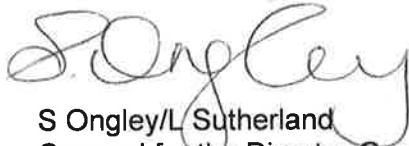
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TIMETABLING:

In addition to the matters raised in Counsel's Memorandum earlier today, DOC seeks the following step be included in timetabling (bolded below). It was understood this step was agreed between Counsel but as Mr Ashton is in Court today and Mr Green in an offsite workshop, DOC formally seeks this step for the avoidance of doubt:

- **20 May 2021: Applicant distributes its revised (updated) consent conditions and GMCP's.**
- 28 May 2021: Supplementary s 42A report addressing the reporting officers' position in light of the process since the hearing was adjourned and attaching recommended consent conditions and GMCP's.
- 4 June 2021: Reply submissions/evidence from submitters, which may include:
 - submissions on the implications of the NPSFM and the NES-Freshwater and recent Environment Court decisions on the Proposed Northland Regional Plan (Water allocation/quantity);
 - Submissions and/or evidence on proposed consent conditions and GMCP's.
- 11 June 2021: Applicants' reply submissions (and any further evidence in reply).

Dated this 14th day of May 2021



S Ongley/L Sutherland
Counsel for the Director-General of Conservation