

**BEFORE THE INDEPENDENT COMMISSIONERS APPOINTED BY WAIKATO
REGIONAL COUNCIL**

In the matter of the Resource Management Act 1991

And submissions and further submission on Proposed Waikato
Regional Plan Change 1 – Waikato and Waipā River
Catchments (PPC1) and Variation 1 to the same

Submitter's Name: Theland Tahī Farm Group Limited
Southern Pastures Limited Partnership

Date: 30 April 2019

**MEMORANDUM OF COUNSEL FOR THELAND TAHI FARM GROUP LIMITED
AND SOUTHERN PASTURES LIMITED PARTNERSHIP
Dated 30 April 2019**

TOMPKINS | WAKE

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May it please the hearing panel

1. Counsel refers to the date by which evidence of submitters on Block 2 is due to be filed, being 3 May 2019.
2. Theland Tahi Farm Group Limited and Southern Pastures Limited Partnership ("submitters") intend to file two brief statements of evidence from Dr Debbie Care (environmental science) and Mr Mark Crisp (planning).
3. Due to overseas travel arrangements which were arranged prior to confirmation of dates for evidence being due, unexpected illness of one witness and conflicting professional commitments in the week of 29 April 2019, counsel for the submitters seeks an extension of three working days for the lodgement of evidence on Block 2.
4. Counsel does not consider the extension will cause any prejudice to other parties on the basis that:
 - (a) The hearing of Block 2 evidence does not commence until 20 May 2019;
 - (b) The statements are intended to be brief and limited in scope; and
 - (c) The submitters are not scheduled to appear before the Commissioners until 8 July 2019.
5. Accordingly, counsel respectfully requests an extension until 5pm on Wednesday, 8 May 2019 for the submitters to lodge Block 2 evidence with the Hearings Administrator.

DATED this 30th day of April 2019.



M Mackintosh
Counsel for Theland Tahi Farm Group Limited and Southern Pastures Limited Partnership

