



Brookfields

LAWYERS

19 October 2009

BY EMAIL

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ATTENTION: Robyn Harrison

PROPOSED ONE PLAN – Water Hearings

Please find **enclosed** memorandum of counsel and evidence produced in support of the TA Collective's submission.

Please contact us if we can be of any assistance.

Yours faithfully
BROOKFIELDS



Andrew Green / Andrew Cameron
Partner / Consultant

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Encl

31252661:606494

BEFORE THE MANAWATU-WANGANUI REGIONAL COUNCIL

UNDER Resource Management Act 1991

IN THE MATTER of submissions on the Manawatu-Wanganui Consolidated Regional Policy Statement, Regional Plan, and Regional Coastal Plan for the Horowhenua, Manawatu, Rangitikei, Ruapehu, Tararua, and Wanganui District Councils

AND

IN THE MATTER of hearings by the Manawatu-Wanganui Regional Council regarding the Manawatu-Wanganui Consolidated Regional Policy Statement, Regional Plan, and Regional Coastal Plan – Water


MEMORANDUM OF COUNSEL ON BEHALF OF THE TA COLLECTIVE

**BROOKFIELDS
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MAY IT PLEASE THE HEARINGS COMMITTEE

1. Evidence filed in support of the TA Collective's submission is filed herein.
2. However, caucusing of witnesses will occur in the coming months and some qualification of this evidence is anticipated in light of those discussions. Further, discussions have been occurring between officers of the TAs and those of the Regional Council with some areas of agreement found. These are not, however, reflected in the evidence filed today and some qualification of the evidence will therefore be required to incorporate those areas of agreement. It is intended that the parties will continue to work cooperatively as this process unfolds. Some elucidation of the evidence may therefore be required.
3. In any event, David Forrest, the TAs' planning consultant, has been unable to complete his assessment of the Plan, in particular the linkages between the objectives, policies, and rules, because Ms Clare Barton will not be providing linkage statements until her supplementary statement. Similarly, Ms Barton will be assessing the operation of Schedule D within her supplementary statement. Once this critical information is received, Mr Forrest's evidence will certainly require elucidation.

DATED at Auckland this ²19 day of October 2009



A F D Cameron / A M B Green
Counsel for the Collective of Territorial Authorities