

BEFORE THE CANTERBURY REGIONAL COUNCIL

IN THE MATTER of a proposed plan change
under Schedule 1 to the
Resource Management Act
1991

AND

IN THE MATTER of submissions by of
submissions by **TE NGĀI
TŪĀHURIRI RŪNANGA**
and **TE RŪNANGA O NGĀI
TAHU** on **PROPOSED
PLAN CHANGE 7 ON THE
CANTERBURY LAND
AND WATER REGIONAL
PLAN**

**MEMORANDUM OF COUNSEL FOR TE NGĀI TŪĀHURIRI RŪNANGA AND TE
RŪNANGA O NGĀI TAHU**

26 November 2020



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MAY IT PLEASE THE HEARINGS PANEL

1. This memorandum is filed on behalf of Te Ngāi Tūāhuriri Rūnanga and Te Rūnanga o Ngāi Tahu (collectively referred to as **Ngā Rūnanga**).
2. Ngā Rūnanga respectfully seeks a direction from the Hearings Panel that Mr Barry Bragg, witness for Ngā Rūnanga, be excused from attendance at the hearing on Monday 30 November 2020.
3. Mr Bragg provided a written statement of evidence dated 22 July 2020, on behalf of Ngāi Tahu Farming, with the support of Ngā Rūnanga. Due to an urgent and unforeseen issue, Mr Bragg is regrettably now unavailable to attend the hearing.
4. Another officer for Ngāi Tahu Farming, Mr Rhys Narbey, is available to attend in Mr Bragg's place, should the Panel require a representative of Ngāi Tahu Farming to be present. Mr Narbey is fully familiar with the matters covered by Mr Bragg's evidence and the operations of Ngāi Tahu Farming.
5. Counsel's preference is however that Mr Bragg's evidence be taken as read and entered onto the record. If the Hearing Panel has any questions for Mr Bragg arising from his evidence, these can be relayed to him so that he is able to provide a prompt written response. It is submitted that this course will not prejudice any party, nor cause significant disruption to the hearing.
6. The specific directions Ngā Rūnanga are seeking from the Panel are as follows:
 - (a) Mr Barry Bragg is excused from attendance at the hearing on Monday 30 November 2020, with his evidence in chief to be taken as read and entered onto the record; and
 - (b) Any questions from the Panel be provided to Mr Bragg, and responded to in writing within a timeframe to be directed by the Panel.

DATED at Wellington this 26th day of November 2020



J G A Winchester / S K Lennon
Counsel for Ngā Rūnanga