

**BEFORE THE HEARING PANEL**

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of Proposed Plan Change 37 - Nukuhau (private) by AN Rajasingham LPT Trustees No 124 Limited anors to the Taupō District Council to rezone c.78ha of land in the Nukuhau area from Rural Environment to a mix of General Residential and Mixed Density Residential with a Neighbourhood Shopping Centre overlay.

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**MEMORANDUM OF COUNSEL ON BEHALF OF THE APPLICANTS**

**Dated 26 November 2021**

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**LACHLAN MULDOWNY**

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**MAY IT PLEASE THE HEARING PANEL**

1. At the conclusion of the hearing on 9 November 2021 the commissioners issued a direction adjourning the hearing and requiring the applicant to file its closing legal submissions, any final planning evidence, and accompanying final draft plan provisions, by 29 November 2021.
2. In order to finalise the draft plan provisions the applicant's planning expert, Ms Cleary, was required to co-ordinate with the Council's s 42A author, Mr Bonis.
3. Those experts have been conferring and Mr Bonis has this morning completed providing his feedback to Ms Cleary. Ms Cleary is now in a position to finalise her planning evidence and final draft plan provisions.
4. However, the content of closing legal submissions is contingent on this planning evidence and cannot be completed without close reference to it. Counsel has a full day hearing commitment in the Environment Court on Monday 29 November, which makes completing the closing legal submissions by 29 November impossible under such a tight timeframe.
5. Accordingly, on behalf of the applicant, counsel respectfully seeks an extension of the current timetable for filing closing legal submissions, final planning evidence and final plan provisions, to Friday 3 December 2021.

Dated 26 November 2021



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L F Muldowney/S K Thomas  
Counsel for Applicants

