

BEFORE THE HEARING PANEL

UNDER the Resource Management Act 1991
(**RMA**)

IN THE MATTER of the Proposed Far North District
Plan, pursuant to Schedule 1, Part 1
RMA

AND

IN THE MATTER of submissions and further
submissions on behalf of
Haititaimarangai Marae Kaitiaki Trust
and Carrington Estate Jade LP and
Carrington Farm Jade LP

**JOINT MEMORANDUM OF COUNSEL REGARDING CARRINGTON
ESTATE ZONE**

2024



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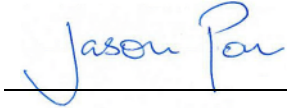
Counsel Acting:
Jason Pou & Troy Ulrich
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MAY IT PLEASE THE PANEL

1. This memorandum of Counsel is filed on behalf of the Haititaimarangai Marae Kaitiaki Trust (**Haititaimarangai Marae**) and Shanghai CRED, Gorges Jade Holding Ltd (**Carrington**).
2. Haititaimarangai Marae and Carrington made submissions and further submissions on the Carrington Estate Zone (**CEZ**) provisions of the Proposed Far North District Plan (**Proposed Plan**).
3. The Proposed Plan hearing date for the CEZ provisions is part of topic 10, between 24-27 March 2025 (**CEZ Hearing**).
4. The Haititaimarangi Marae has filed an application with the Environment Court for a Declaration relating to the resource consents, being RC 1990480 and RC 199181 (**1999 Consents**) granted by the Council for Carrington Estate in 1999, (**Declaration**). Carrington and the Council are respondents in the Declaration application. The Declaration has been scheduled to be heard on 29 – 30 January 2025.
5. The parties agree that a decision on the Declaration may not be issued before the CEZ Hearing
6. Haititaimarangai Marae consider that the Declarations are significant and relevant to the CEZ hearing. Carrington have a different view. Notwithstanding, the parties both agree that the hearing should be delayed.
7. Council was invited to join this memorandum. It advised that it did not consider it appropriate to be a party to this memorandum.
8. It is respectfully suggested that an appropriate topic for the CEZ Hearing is topic 15A which is scheduled for 25-26 August 2025.
9. The parties therefore request that the CEZ Hearing is removed from topic 10 and scheduled for later in 2025, and preferably topic 15A.

Haititaimarangi consider this approach will assist in achieving efficiency.

Dated ^ 2024

A handwritten signature in blue ink that reads "Jason Pou". The signature is written in a cursive style and is positioned above a solid horizontal line.

Jason Pou

Counsel for Haititaimarangi Marae

A handwritten signature in blue ink that reads "Julian Spring". The signature is written in a cursive style and is positioned above a solid horizontal line.

Bianca Tree / Julian Spring

Counsel for Carrington